

NEW YORK STATE ENVIRONMENTAL QUALITY REVIEW ACT (SEQRA)  
**FINAL SUPPLEMENTAL GENERIC ENVIRONMENTAL IMPACT STATEMENT**

# WHITE PINE COMMERCE PARK

5171 Route 31 Town of Clay, NY 13041

## Lead Agency: Onondaga County Industrial Development Agency

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## 1.0 EXECUTIVE SUMMARY

### 1.1 Project Location and Description

The Onondaga County Industrial Development Agency (“OCIDA”) proposes to expand its modern industrial park at the White Pine Commerce Park (“Park”), formerly known as the Clay Business Park. The Park is located northeast of the intersection of NYS Route 31 and Caughdenoy Road in the Town of Clay, Onondaga County, New York. The Park is approximately 7 miles north of the City of Syracuse.

The Park was created to be capable of supporting a mix of industrial and/or commercial uses with related office space, advanced state-of-the-art research, large- or small-scale manufacturing, assembly, warehousing, data management, material processing and distribution facilities in a campus-like setting.

OCIDA has devoted substantial time and effort into developing the Park, with a particular focus on development that will bring high-tech facilities and high paying jobs to Onondaga County. More recently OCIDA has focused its efforts on the semiconductor industry. These efforts have been unsuccessful to date as it has become apparent that a larger geographic footprint is necessary in order to support this type of industry and associated investment required by the tenants.

OCIDA, as Project Sponsor, proposes to expand the Park to approximately 1,250± acres (the “Project” or “Action”). OCIDA currently owns approximately 648± acres, has another 282± acres under contract, and would acquire approximately 320± additional acres. The acreage to be acquired are parcels contiguous to the current Park, and are generally located along Route 31, and along the east and west sides of Burnet Road. OCIDA would acquire the additional parcels through purchase agreements with existing landowners or, if necessary, pursuant to the Eminent Domain Procedure Law (“EDPL”), to avoid fragmented parcels that would hinder future development.

### 1.2 Project Overview and History

This Final Supplemental Generic Environmental Impact Statement (“Final SGEIS”) is a supplement to the 2013 Final Generic Environmental Impact Statement that was completed (“2013 FGEIS”) and OCIDA’s issuance of a Findings Statement that concluded that development of the then existing 340±-acre Park avoided or minimized adverse environmental impacts to the maximum extent practicable, and incorporated mitigation measures that were considered practicable.



Figure 1.1 Project Location



## 1.3 Project Purpose and Need

The Project purpose is to expand the Park to enable OCIDA to market the Park to a larger, more diverse mix of potential industrial and commercial developers by making the Project site more attractive to a broader scope of industries, particularly the semiconductor industry, bringing high tech and high paying jobs to Onondaga County.

This Final SGEIS, which incorporates by reference the Draft Supplemental Generic Environmental Impact Statement (“Draft SGEIS”), identifies, evaluates, and addresses various impact thresholds, permit criteria, and mitigation measures anticipated for the expanded Park, including those attributes associated with large-scale semiconductor industrial development. By addressing these issues in a generic EIS format, the State Environmental Quality Review Act (“SEQRA”) process defines a set of threshold conditions or criteria under which potential future actions and development will be undertaken or approved, including any subsequent SEQRA compliance requirements.

## 1.4 Proposed Development

The 2013 FGEIS detailed a preferred development scenario, which anticipated a full build-out of approximately 2.0 to 2.5 million square feet of industrial development and assumed that the Project would be developed in several phases. Given the lack of any specific tenant and uncertain timing for development of future phases, this Final SGEIS considers the potential impacts associated with the development of the Park, including the expanded area, while providing for further evaluation, as necessary, when a conceptual plan for a specific development is available.

The development evaluated in this Final SGEIS contemplates OCIDA’s focus on developing the Park with a tenant or tenants in the semiconductor industry. This may translate into a buildout encompassing approximately 4.0 million square feet of industrial development at the Park. This would equate to approximately 400 acres of surface disturbance (temporary and permanent) within the Park developed in a campus like setting that would be sited to avoid regulated wetland areas and would limit the height of structures to no more than 160 feet. This anticipated development is expected to bring approximately 4,000 jobs covering three shifts that operate 24/7 year-round.

## 1.5 Project Alternatives

As part of its prior environmental review of the Park, which culminated in the 2013 FGEIS and 2013 Findings Statement, OCIDA considered a number of alternatives, including a no action alternative, alternative sites, alternative uses and technologies, alternative scale, timing and magnitude of development, and alternative site design and layout. *See* 2012 Draft GEIS, Section 2.0. This analysis, including the lack of other viable locations within the County to accommodate the intended scale of the Park, and OCIDA’s already substantial investment in the Park, confirm that the proposed Project, namely, the expansion of the Park to approximately 1,250± acres, is the preferred alternative.

Beginning in 1991, OCIDA considered several locations for the development of an Industrial Park, including conducting a Feasibility Study at that time. Then, as part of OCIDA’s prior environmental



review of the Park, OCIDA again considered alternatives, specifically alternative locations. Ultimately, it was concluded in 2013 that the Park was the preferred location.

OCIDA adopted the 2013 FGEIS and issued a Findings Statement which concluded, among other things, that the Park was the preferred location for the project. As a result, the Park was created to be capable of supporting a mix of industrial and/or small commercial uses with related office space, advanced state-of-the-art research, large- or small-scale manufacturing, assembly, warehousing, data management, material processing and distribution facilities in a campus like setting. This background served the basis for the alternatives analysis in the Draft SGEIS and this Final SGEIS.

In the Draft SGEIS, OCIDA revisited its prior alternatives analysis and evaluated the following alternatives: no action (Alternative 1); considering the Park as it was originally proposed in the 2013 FGEIS (Alternative 2); utilizing a smaller expanded area – less than the approximately 1,250± acres (Alternative 3); and considering a different location to site the Park (Alternative 4). Based on this analysis, the proposed Project was deemed preferred. More specifically, expansion of the existing Park was deemed preferred over restarting a new park at an alternative location.

First and foremost, the Park already exists and represents a substantial footprint of prime developable land that is appropriately zoned for industrial development. To start anew would effectively render the existing Park unusable as OCIDA's long-standing efforts to develop the Park as intended in 2013 have proved unsuccessful. Further, after looking at alternative sites for the last 20 years, OCIDA has determined that there are no other viable locations in Onondaga County that meet the stated purpose of the Project, which is to bring high-tech facilities and high paying jobs to Onondaga County in furtherance of OCIDA's mission.

The expanded Park can accommodate large-scale industrial tenants that cannot easily locate elsewhere in Onondaga County due to their size and space requirements and need for suitable infrastructure. To OCIDA's knowledge, there are no other sites in Onondaga County to accommodate a developer from the semiconductor industry that contain sufficient land acreage and proximate to the necessary electric, gas, water and wastewater infrastructure.

Key aspects of the Park include the following:

- National Grid's Clay Substation is located adjacent to the Park on the west side of Caughdenoy Road. This existing substation is a major hub for high-voltage bulk power transmission and the estimated Project demand of 500 MVA is within the levels that National Grid has indicated can be provided.
- The Oak Orchard Wastewater Treatment Plant is located approximately 2.5 miles west of the Park and can accommodate the estimated sanitary sewer discharges from potential development of the expanded Park.
- The Park is bisected by a 54-inch water main Onondaga County Water Authority ("OCWA") has indicated that there is sufficient public water service to meet the expanded Park's estimated water demand.
- NYS Route 31, which is a principal arterial west of Interstate-81, is located adjacent to the Park. This provides a crucial transportation network to service prospective tenants.



- An existing CSX rail line crosses the northwestern corner of the Park generally in a northeast/southwest direction.

## 1.6 Supplemental Environmental Review

OCIDA prepared a Full Environmental Assessment Form (“FEAF”) for the Project to supplement its prior SEQRA review of the Park. On December 8, 2020, based on an examination of the FEAF, the criteria contained in 6 NYCRR §617.7(c), and its knowledge of the area surrounding the Project site, OCIDA adopted a resolution classifying the Project as a Type I action, declared its intent to act as lead agency for the purpose of conducting a coordinated environmental review, determined that the Project has the potential to result in at least one significant adverse impact, and issued a positive declaration for the Project. Additionally, OCIDA determined that the Project represents a significant change from the Park’s current footprint and that there exists other changes in circumstances from those previously evaluated in the 2013 FGEIS. As a result, OCIDA concluded that the preparation of a Supplemental GEIS (“SGEIS”) is necessary to adequately identify and evaluate potential significant adverse impacts associated with the Project that are not addressed or are inadequately addressed in the 2013 FGEIS. To that end, OCIDA adopted and issued a Notice of Intent to Serve as Lead Agency and Prepare a Draft SGEIS (“Notice of Intent”) for the Project, which was subsequently filed and distributed in accordance with SEQRA.

OCIDA received concurrence from the Onondaga County Water Authority (“OCWA”) and from the New York State Department of Environmental Conservation (“NYSDEC”) for OCIDA to act as the Lead Agency. All other identified Involved Agencies did not object to OCIDA’s lead agency declaration.

OCIDA then caused the Draft SGEIS to be prepared in accordance with 6 NYCRR 617.9, as applicable to a supplemental assessment. On May 6, 2021, OCIDA adopted the Draft SGEIS as complete for the purposes of commencement of public review and set a June 11, 2021 deadline for the receipt of public comments. On that same day, OCIDA adopted a Public Hearing Resolution which provided notice that a public hearing concerning the Draft SGEIS would be held virtually on May 24, 2021 at 6:00pm in accordance with the modifications to Article 7 of the Public Officers Law (the “Open Meetings Law”) as modified by New York Governor Andrew Cuomo’s Executive Order 202.1.

In total, there were 74 comments received from the general public on the Draft SGEIS, some of which were duplicates, for a total of 64 commenters, some in support of the Project and others opposed, which includes three comments from local elected officials. In addition, comments were received from two state agencies.

This Final SGEIS has been prepared by OCIDA and addresses the potential impacts of the expansion of the existing Park on environmental resources, including land use and zoning; community character; transportation; utilities and community services; topography, geology and soils; water resources including floodplains and wetlands; air resources; ecological resources including endangered and threatened species; cultural and archeological resources; visual character and noise.

Consistent with SEQRA, this Final SGEIS will be followed by a SEQRA Findings Statement from OCIDA. This Final SGEIS responds to all substantive comments received on the Draft SGEIS.



## 2.0 INTRODUCTION AND PROJECT DESCRIPTION

### 2.1 Project Description

The Onondaga County Industrial Development Agency (“OCIDA”) proposes to expand its existing White Pine Commerce Park (“Park”), formerly known as the Clay Business Park. The Park is located northeast of the intersection of NYS Route 31 and CR 49 (Caughdenoy Road) in the Town of Clay, Onondaga County, New York. It was created to be capable of supporting a mix of industrial and/or commercial uses with related office space, advanced state-of-the-art research, large- or small-scale manufacturing, assembly, warehousing, data management, material processing and distribution facilities in a campus-like setting.

OCIDA has devoted substantial time and effort into determining the highest and best use of the Park, with a particular focus on site attributes that will bring high-tech facilities and high paying jobs to Onondaga County. More recently OCIDA has focused its efforts on the semiconductor industry. These efforts have been unsuccessful to date as it has become apparent that a larger geographic footprint is necessary in order to support this type of industry and the associated investment required by the tenant(s).

OCIDA, as Project Sponsor, proposes to expand the Park to approximately 1,250± acres (the “Project” or “Action”). OCIDA currently owns approximately 648± acres, has another 282± acres under contract, and would acquire approximately 320± additional acres. The acreage to be acquired are parcels contiguous to the current Park, and are generally located along Route 31, and along the east and west sides of Burnet Road. OCIDA would acquire the additional parcels through purchase agreements with existing landowners or, if necessary, pursuant to the Eminent Domain Procedure Law (“EDPL”), to avoid fragmented parcels that would hinder future development.

### 2.2 Project Overview and History

In 1991, OCIDA and the Syracuse Chamber of Commerce commissioned an Industrial Park Feasibility Study to identify potential candidate sites for locating industrial businesses in Onondaga County. The feasibility study identified two primary candidate locations for large-scale industrial uses, one in the Town of Lysander north of NYS Route 31 and one in the Town of Clay along NYS Route 31 and Caughdenoy Road. The Lysander site was considered less suitable of the two sites due in part to the presence of substantial wetlands and hydric soil conditions. The Clay site was therefore chosen by OCIDA as the more feasible location for development.

OCIDA acquired seven properties that comprised the then-existing approximately 340± acre Park site along Caughdenoy Road. OCIDA then completed an environmental review under the State Environmental Quality Review Act (“SEQRA”) of the Park and any adjoining routes, rights-of-way and areas needed to support the project at that time, including existing and proposed infrastructure and improvements. That review culminated in preparation of a Final Generic Environmental Impact Statement (“2013 FGEIS”) and OCIDA’s issuance of a Findings Statement that concluded that the creation and potential future development of the then existing approximately 340± acre Park avoided or minimized





adverse environmental impacts to the maximum extent practicable, and incorporated mitigation measures that were considered practicable.

OCIDA thereafter invested considerable resources in marketing the Park for development. Certain prospective tenants expressed interest in the approximate 340± acre Park over the years but the relatively small size of the current Park was seen as a limiting factor by some. As a result, the Park remains undeveloped. Nevertheless, the Park has many favorable characteristics, including, but not limited to, its proximity to critical utilities and infrastructure, which makes it a very suitable location for large-scale tenants.

The Draft Supplemental Generic Environmental Impact Statement (“Draft SGEIS”) was been prepared consistent with SEQRA (Article 8 of the Environmental Conservation Law Part 617 of Title 6 of the New York Code of Rules and Regulations). In New York State, most projects of this nature and activities proposed by a state agency or unit of local government, and all discretionary approvals and permits from a state agency or unit of local government, require an environmental impact assessment of a proposed action before such action may be approved, undertaken or funded. SEQRA requires the sponsoring or approving governmental body, in this case OCIDA, acting as SEQRA Lead Agency, to identify, evaluate, and mitigate, to the maximum extent practicable, significant environmental impacts associated with the proposed action. For SEQRA purposes, the term “Project site” used in this document is defined as any location where project facilities and infrastructure will or might be constructed. The Project site includes an expanded Park consisting of approximately 1250± acres and any adjoining routes, rights-of-way and areas needed to support the Project or Project-related mitigation, including existing or proposed infrastructure and improvements. “Off-site” is defined as any portion of the study areas being assessed for potential impacts that are not on or encompassed by the Project site. Because OCIDA previously prepared the 2013 FGEIS for the Park, the Draft SGEIS evaluated the expanded development footprint of the Park and other changes in circumstances that have the potential to result in any new, previously undisclosed, or unevaluated significant adverse impacts.

## **2.3 Project Purpose and Need**

The Project purpose is to expand the Park to enable OCIDA to market the Park to a larger, more diverse mix of potential industrial and commercial developers by making the Project site more attractive to a broader scope of industries, particularly the semiconductor industry, and bringing high tech and high paying jobs to Onondaga County.

The Draft SGEIS identifies, evaluates and addresses various impact thresholds, permit criteria and mitigation measures anticipated for the expanded Park, including those attributes associated with large-scale semiconductor industrial development. By addressing these issues in a Generic EIS format, the SEQRA process will define a set of threshold conditions or criteria under which potential future actions and development will be undertaken or approved, including any subsequent SEQRA compliance requirements.



## 2.4 Project Location and Setting

The Park is located at the northeastern corner of the intersection of NYS Route 31 and Caughdenoy Road in the Town of Clay, Onondaga County, NY. The Park is approximately 7 miles north of the City of Syracuse. Figure 2.1 depicts the Project Location.

The Park is accessible from major nearby interstates. This includes Interstate 81 (I-81) via Exit 30 at NYS Route 31 in Cicero, approximately 2.2 miles east of the Project site. The I-81/I-481/NYS Route 481 interchange is four miles southeast of the project. The NYS Route 481/NYS Route 31 interchange is approximately 3.5 miles west of the Park. The New York State Thruway (I-90) is about 6.5 miles south of the Park. Syracuse Hancock International Airport is about 5 miles south of the Park located along the I-81 corridor.



Figure 2.1 Project Location

The Park is located in the eastern portion of the Town of Clay, adjacent to the Town of Clay/Town of Cicero boundary. The Town of Clay is a northern suburb of the City of Syracuse. Clay is the largest town in Onondaga County occupying approximately 48 square miles with a 2019 Census population of 59,250 people. The population of the Town has remained largely unchanged over the past two decades decreasing 0.84% since 1990. The area surrounding the Park is sparsely populated with relatively low-density residential development mostly along Caughdenoy Road and Verplank Road west of the Park, Mud Mill Road north of the Park and Burnet Road within and near the eastern boundary of the Park. I-81 is located a little more than one mile to the east of the site.

Residential and commercial development in northern suburbs of Onondaga County is likely to continue, according to the most recent studies conducted by the Town of Clay, the Syracuse-Onondaga County Planning Agency (“SOCPA”), and the Syracuse Metropolitan Transportation Council (“SMTC”). These studies include a corridor study conducted in 2010 by the SMTC titled *Clay-Cicero Route 31 Transportation Study*, the *Town of Clay Northern Land Use Study* prepared in 2013, and the *2010 Development Guide for Onondaga County*. New residential development has occurred south and east of the Park, primarily along the NYS Route 31 corridor in the Town of Cicero. The Town of Cicero had a 2019 population of 30,721 people, a decrease of 2.89% since 2010.

The SOCPA, SMTC, and Town of Clay studies assume future growth in the project area and account for future industrial use of the Park.



## 2.5 Proposed Development

The 2013 FGEIS detailed a preferred development scenario, which anticipated a full build-out of approximately 2.0 to 2.5 million square feet of industrial development and assumed that the Park would be developed in several phases over the course of perhaps 10 to 15 years. Specifically, the 2013 FGEIS considered a full build out scenario of the Park in three development areas. Given the lack of any specific tenant and uncertain timing for development of future phases, the Draft SGEIS considers the potential impacts associated with the development of the Park, including the expanded area, while providing for further evaluation, as necessary, when a conceptual plan for a specific development is available.

The development evaluated in this Final SGEIS contemplates OCIDA's focus on developing the expanded Park with a tenant or tenants in the semiconductor industry. This may translate into a buildout encompassing approximately 4.0 million square feet of industrial development at the Park. This would equate to approximately 400 acres of surface disturbance (temporary and permanent) within the Park developed in a campus like setting that would be sited to avoid regulated wetland areas and would limit the height of structures to no more than 160 feet. This anticipated development is expected to bring approximately 4,000 jobs covering three shifts that operate 24/7 year-round.

Based on a review of similar types of facilities being developed in other areas of the country, and given existing site conditions and the Project purpose, the buildout would likely include the following:

- A combined total of approximately 4.0 million square feet (SF) of buildings in a campus like setting made up of the type of uses identified in the 2013 FGEIS (manufacturing, laboratory, R&D, fabrication, warehousing, office, support, utility, waste, service yards, energy, water treatment);
- Approximately 50 acres of paved area for parking (which may include parking garages), loading, internal road circulation and/or shipping/receiving areas;
- Two (2) access roads entering the Project site from NYS Route 31 and Caughdenoy Road;
- Approximately seven miles of new sanitary sewer line from the Oak Orchard WWTP to service the surrounding sewer district, including the Park;
- Approximately four miles of new gas lines to the Park
- Approximately 5,000 linear feet of underground electric lines to the Park
- Areas undeveloped and set aside for greenspace, wetland preservation, conservation, and if necessary, mitigation;
- Additional areas for:
  - Stormwater management
  - Truck scales and security guard stations
  - Fuel storage
  - Employee amenities, trails and open space
  - Landscaping, security fencing, signage, earthen berms and vegetated buffers.

Project development will include site infrastructure consisting of internal roads, drainage culverts, waterlines, sewer and wastewater systems, electric, natural gas, stormwater management systems, lighting, landscaped areas, earthen berms and areas maintained as undeveloped natural buffers. It is anticipated that areas owned by OCIDA that are north of existing New York Power Authority ("NYPA") and National Grid transmission lines will not be developed to avoid actual or potential wetland areas. Upland areas alongside these wetlands may be suitable as possible wetland mitigation areas, if necessary,

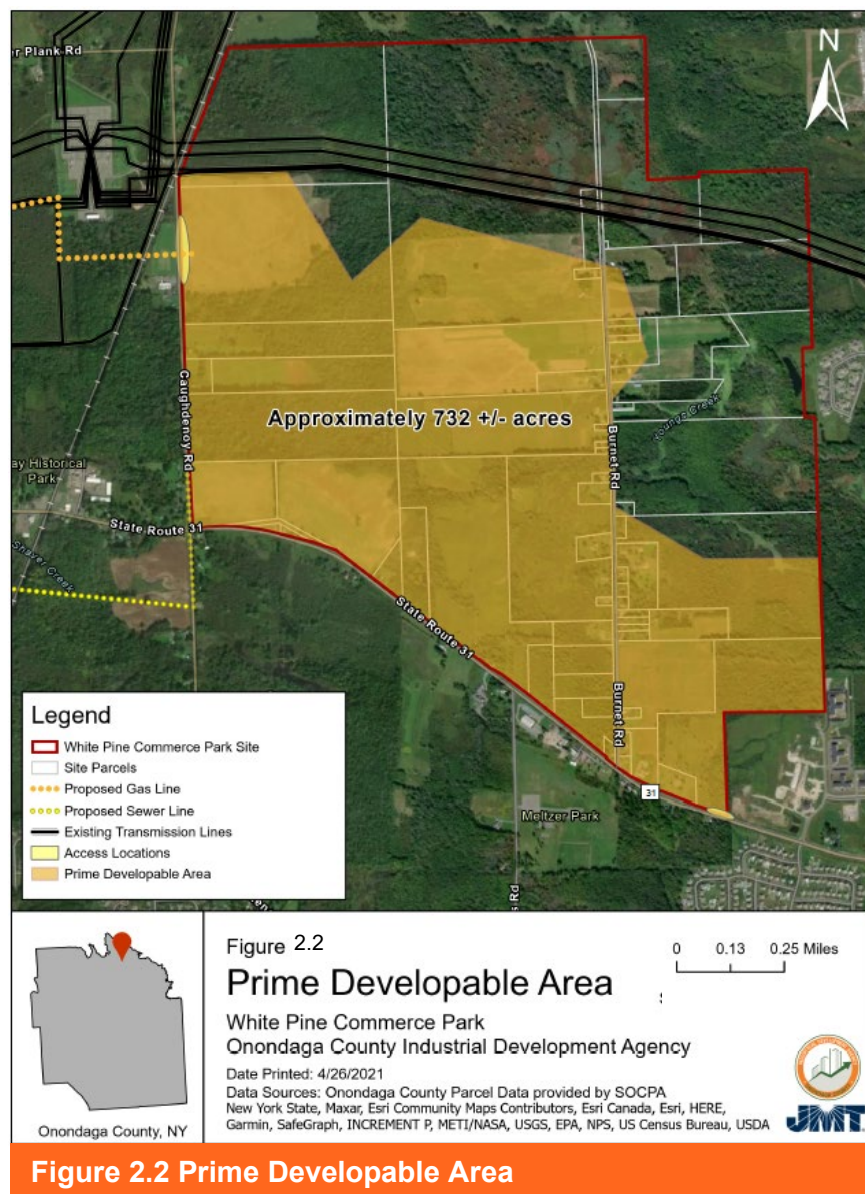




for potential impacts that cannot be avoided or minimized by a future specific development, which is not covered by this Final SGEIS.

The development of the Park will occur south of the National Grid/NYPA transmission lines and avoid most of the eastern portion of the Project site due to the likely existence of wetlands and wetland buffer areas. This area includes approximately 732± total acres of prime developable land within the Park. This area has been identified as the prime developable area due to the anticipated absence of wetland features, the generally flat topography, and the access to the surrounding transportation network and potential access points along NYS Route 31 and Caughdenoy Road. The prime developable area within the Project site is also positioned away from the overhead transmission lines, which run across the northern portion of the Project site. The proposed gas line and sewer connection would also tie directly into this portion of the Project site with limited, if any, impacts to wetlands or other natural features anticipated.

Figure 2.2 depicts the Prime Developable Area.



## 3.0 PERMITTING AND SEQRA PROCESS

### 3.1 State Environmental Quality Review Act

Pursuant to regulations promulgated under SEQRA, all state, regional, and local government agencies are to consider potential environmental impacts equally with social and economic factors during preliminary stages of proposed development actions. The Lead Agency and other Involved Agencies must assess the environmental significance of all actions they have discretion to approve, fund, or directly undertake.

Under SEQRA, a Generic Environmental Impact Statement (“GEIS”) 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 site design become known. It is appropriate to conduct an environmental review of the Project as a GEIS because the Project’s development scenario offers a reasonable prediction of anticipated development while preserving flexibility to accommodate various industrial uses, buildings and facilities, scales of development and site design.

The SEQRA process provides guidance on the preparation of a GEIS and the coordinated review of subsequent actions. According to 6 NYCRR Part 617.10(c) of SEQRA:

*“Generic EISs and their findings should set forth specific conditions or criteria under which future actions will be undertaken or approved, including requirements for any subsequent SEQRA compliance. This may include thresholds and criteria for supplemental EISs to reflect specific significant impacts, such as site specific impacts, that were not adequately addressed or analyzed in the generic EIS.”*

The Draft SGEIS identifies, evaluates and provides information on avoiding, minimizing, and mitigating potential environmental impacts resulting from development of the Park as defined in the Draft SGEIS. The Draft SGEIS establishes a set of conditions and thresholds describing the site, project components and environmental impacts potentially associated with the Project site’s development. Future development proposals for the Park are expected to be generally consistent with the scale and distribution of facilities as discussed in the Draft SGEIS and with SEQRA Findings that will be prepared subsequent to the Draft SGEIS.

Future actions that fall within the range of impacts evaluated in the Draft SGEIS are not expected to require further SEQRA review. By identifying baseline environmental conditions and certain impact thresholds, the SGEIS 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 SGEIS and SEQRA Findings. If subsequent proposed actions are not addressed or not adequately addressed in the Draft SGEIS and the subsequent actions will not result in any significant environmental impacts, then SEQRA requires only that a Negative Declaration be prepared. In the event that subsequent proposed actions are



adequately addressed in the SGEIS, but not adequately addressed in the Findings Statement, an amended Findings Statement will be prepared.

However, if any components associated with future development of the Park do not fall within the set of conditions and criteria defined or anticipated by the Draft SGEIS, another supplement to the Final SGEIS may need to be prepared to further evaluate and identify mitigation of significant adverse environmental impacts associated with specific development proposals that are inconsistent with this SGEIS.

SEQRA requires a supplement to the Final GEIS (a Supplemental EIS) if:

*“...the subsequent proposed action was not addressed or was not adequately addressed in the generic EIS and the subsequent action may have one or more significant adverse environmental impacts.”*

As future development is proposed for the Park, the Lead Agency established at that time under SEQRA for each proposed action will be responsible for evaluating the guidance contained at 6 NYCRR Part 617.10 regarding the need for further SEQRA compliance measures.

## 3.2 Chronology of Previous Environmental Reviews

In 2012, OCIDA undertook an environmental review of the Park. As part of the prior environmental review for the Park, on March 6, 2012, OCIDA established itself as the Lead Agency under SEQRA and assumed the responsibilities for conducting the coordinated environmental review. OCIDA determined that the project was a Type 1 action requiring preparation of an EIS. As specific tenants and uses within the Park were unknown at that time, OCIDA prepared a GEIS to analyze potential environmental impacts of the project. OCIDA coordinated the SEQRA review for the Park with the other involved agencies.

At the time the GEIS was prepared, the Park was envisioned to consist of a mix of industrial uses that may include office, research, manufacturing, assembly, warehousing, data management, material processing and distribution facilities in a campus-like setting. OCIDA intended to develop the Park for advanced manufacturing and state-of-the-art industrial uses to facilitate the creation of high-paying employment opportunities in Onondaga County.

A draft scoping document was prepared and made available for comment. Following a public comment period, OCIDA issued a Final Scoping Document which identified potential impacts and anticipated impacts to be addressed in the GEIS.

A Draft GEIS (“DGEIS”) was prepared and accepted as complete on September 20, 2012 and made available for public comment. The DGEIS evaluated the potential impacts of the proposed multi-use industrial park, envisioning a certain setting which included, but was not limited to:

- The Park would encompass a certain footprint, accommodating approximately 2 million sq. ft. of multi-use space without adverse impact.
- The Park would accommodate uses such as manufacturing, research and development, warehousing, assembly, office, distribution facilities, associated parking, and other on-site support buildings and structures.



- The Park would maintain greenspace to protect wetlands and avoid impacts.
- Anticipated installation of underground utilities and infrastructure for on-site use (i.e. gas and electric utilities, water and sewer infrastructure).
- Off-site improvements such as highway and road improvements, wastewater treatment infrastructure improvements, and water supply infrastructure improvements.
- Tenants would obtain site or facility-specific permits, such as air permits and non-sanitary sewer discharge permits, as necessary for facility-specific operations.

A Public Hearing on the DGEIS was held on October 16, 2012, and the public comment period ended on October 29, 2012. Subsequently, a Final GEIS (“FGEIS”) was prepared by OCIDA and accepted as complete on September 10, 2013 (“2013 FGEIS”). OCIDA thereafter issued its Findings Statement on October 8, 2013. OCIDA concluded that the action avoided or minimized adverse environmental impacts to the maximum extent practicable, and incorporated mitigation measures that were considered practicable.

### 3.3 Chronology of Current SEQRA Process

OCIDA prepared a Full Environmental Assessment Form (“FEAF”) for the Project to supplement its prior SEQRA review of the Park. On December 8, 2020, based on an examination of the FEAF, the criteria contained in 6 NYCRR §617.7(c), and its knowledge of the area surrounding the Project site, OCIDA adopted a resolution classifying the Project as a Type I action, declared its intent to act as lead agency for the purpose of conducting a coordinated environmental review, determined that the Project has the potential to result in at least one significant adverse impact, and issued a positive declaration for the Project. Additionally, OCIDA determined that the Project represents a significant change from the Park’s current footprint and that there exists other changes in circumstances from those previously evaluated in the 2013 FGEIS. As a result, OCIDA concluded that the preparation of a SGEIS is necessary to adequately identify and evaluate potential significant adverse impacts associated with the Project that are not addressed or are inadequately addressed in the 2013 FGEIS. To that end, OCIDA adopted and issued a Notice of Intent to Serve as Lead Agency and Prepare a Draft SGEIS (“Notice of Intent”) for the Project, which was subsequently filed and distributed in accordance with SEQRA.

The FEAF provided a description of the Project, identified agencies that have potential permitting and approval jurisdiction over the Project, and identified potential environmental impacts. The Project (or Proposed Action) remains classified as a Type 1 Action for the purposes of this supplemental environmental review because the Project (Part 617.4.(b)(7)).

A copy of the FEAF and the Notice of Intent are found in Appendix A.

OCIDA received concurrence from the Onondaga County Water Authority (“OCWA”) and from the New York State Department of Environmental Conservation (“NYSDEC”) for OCIDA to act as the Lead Agency for the purpose of conducting a coordinated environmental review of the Project under SEQRA for the proposed expansion of the Park. All other identified Involved Agencies did not object to OCIDA’s



lead agency declaration within the statutory time period. A copy of the lead agency correspondence is found in Appendix A.

The list of Involved and Interested Agencies identified for the Project is provided as follows:

- Onondaga County Department of Transportation (“OCDOT”)
- Onondaga County Department of Health (“OCDOH”)
- Onondaga County Department of Water Environment Protection (“OCDWEP”)
- Onondaga County Water Authority
- Onondaga County Industrial Development Agency
- Syracuse Metropolitan Transportation Council (“SMTC”)
- New York State Department of Transportation (“NYSDOT”)
- New York State Department of Environmental Conservation (“NYSDEC”)
- New York State Office of Parks, Recreation and Historic Preservation (“NYS OPRHP”)
- United States Army Corps of Engineers (“USACE”)
- United States Fish and Wildlife Service (“USFWS”)
- Town of Clay Town Board
- Town of Clay
- Town of Clay Zoning Board of Appeals
- Town of Clay Planning Department
- Syracuse Onondaga County Planning Agency
- Town of Cicero

Additional agencies and stakeholder organizations that may participate in the review process include, but are not limited to:

- New York Power Authority (“NYPA”)
- National Grid
- CSX Rail
- New York Empire State Development

### **3.4 Draft GEIS Preparation**

The Draft SGEIS was prepared in accordance with 6 NYCRR 617.9, as applicable to a supplemental assessment. As such, it presents a focused assessment of potentially significant adverse impacts associated with the Project and changes in circumstances that have occurred since the 2013 FGEIS and Findings Statement. The 2013 FGEIS was appended by reference.

### **3.5 Public Comment and Review**

On May 6, 2021, OCIDA adopted the Draft SGEIS as complete for the purposes of commencement of public review and set a June 11, 2021 deadline for the receipt of public comments. On that same day, OCIDA adopted a Public Hearing Resolution which provided notice that a public hearing concerning the Draft SGEIS would be held virtually on May 24, 2021 at 6:00pm in accordance with the modifications to Article 7 of the Public Officers Law (the “Open Meetings Law”) as modified by New York Governor Andrew Cuomo’s Executive Order 202.1. Although SEQRA does not require that a public hearing be





held on a draft environmental impact statement (*see* 6 N.Y.C.R.R. § 617), OCIDA determined to hold a public hearing to promote public input.

OCIDA's Notice that the Draft SGEIS was accepted as complete for purposes of commencement of public review and Notice of Public Hearing was published in the NYSDEC's Environmental Notice Bulletin on May 12, 2021 as well as in the Syracuse Post Standard on May 9, 2021.

The Draft SGEIS was made available for review at OCIDA's offices located at 333 West Washington St., Suite 130, Syracuse, New York 13202 and at the Town of Clay Town Hall located at 4401 Route 31, Clay, NY 13041. The Draft SGEIS was also posted to OCIDA's website at: <https://www.ongoved.com/ocida/project-documents/> and was made available from OCIDA upon request.

Comments on the Draft SGEIS were accepted in writing, either by first class mail or electronic mail, or as part of the May 24, 2021 Public Hearing. In total, there were 74 comments received from the general public on the Draft SGEIS, some of which were duplicates, from a total of 64 commenters, some in support of the Project and others opposed, which includes three comments from local elected officials (*see* Section 6.1.2). In addition, comments were received from two state agencies (*see* Section 6.1.1).

Pertinent SEQRA documentation is provided in Appendix A.

### 3.6 FSGEIS and Findings Statement

Subsequent to the Draft SGEIS and as required by SEQRA, this Final SGEIS has been prepared by OCIDA. Consistent with SEQRA requirements this Final SGEIS will be followed by a SEQRA Findings Statement from OCIDA. This Final SGEIS responds to all substantive comments received on the Draft SGEIS.

The Draft and Final SGEIS address the potential impacts of the expansion of the existing Park on environmental resources, including land use and zoning; community character; transportation; utilities and community services; topography, geology and soils; water resources including floodplains and wetlands; air resources; ecological resources including endangered and threatened species; cultural and archeological resources; visual character and noise.

This Final SGEIS incorporates by reference the entire Draft SGEIS and its Appendices. Any recent changes in either the proposed action or new information on the project as a result of comments received are noted as responses to comments in Chapter 4. Chapter 5 of this Final SGEIS summarizes comments received on the Draft SGEIS and responds to all substantive comments received during the comment period. SEQRA documentation is provided in Appendix A of this Final SGEIS. Appendix B includes a transcript of the Public Hearing held on May 24, 2021. Appendix C includes all correspondence and comments received during the public comment period.

Subsequent to this Final SGEIS OCIDA will prepare a Findings Statement consistent with SEQRA requirements. The Findings Statement will include information summarizing potential project impacts and mitigation measures to avoid or reduce adverse impacts. The Findings Statement will complete the SEQRA process.



## 4.0 FUTURE ACTIONS

As Lead Agency, OCIDA assumed the responsibility to prepare this Final SGEIS and conduct coordinated environmental reviews of the Project among all Involved and Interested Agencies as identified above. Subsequent to this Final SGEIS, OCIDA will prepare a SEQRA Findings Statement which will conclude the SEQRA process.

Future actions that fall within the range of parameters and impacts evaluated in the Draft and Final SGEIS are not expected to require further SEQRA review. By identifying baseline environmental conditions and certain impact thresholds, the SGEIS process may facilitate development of a specific development project by allowing for quicker approval of future actions associated with development of the Park that are consistent with the 2013 FGEIS and Final SGEIS and SEQRA Findings Statements.

If subsequent proposed actions are not addressed or not adequately addressed in the 2013 FGEIS and Final SGEIS and the subsequent actions will not result in any significant environmental impacts, then SEQRA requires only that a Negative Declaration be prepared. In the event that subsequent proposed actions are adequately addressed in the 2013 FGEIS and Final SGEIS, but not adequately addressed in the Findings Statement, an amended Findings Statement will be prepared.

However, if any components of a proposed development project do not fall within the set of parameters or conditions, and potential impacts are significantly different in nature or severity from those anticipated by the 2013 FGEIS and Final SGEIS, a supplement to the Final SGEIS (a Supplemental project specific EIS) will be prepared to further evaluate and identify mitigation of significant adverse environmental impacts associated with specific development proposals that are beyond the scope of the 2013 FGEIS and Final SGEIS. This may require additional technical analyses and agency coordination focused only on those issues.

SEQRA requires a supplement to the Final Generic EIS (a Supplemental EIS) if:

*“...the subsequent proposed action was not addressed or was not adequately addressed in the generic EIS and the subsequent action may have one or more significant adverse environmental impacts.”*

For parties proposing future development at the White Pine Commerce Park, a determination must be made as to whether or not the impacts associated with the proposal have been adequately addressed by the Final SGEIS. If the need for supplemental action is determined to be required under SEQRA, the Lead Agency will be responsible for carrying out the requirements of 6 NYCRR Part 617.10 requirements. This will require the Lead Agency to interpret the Statement of Findings prepared under this Final SGEIS for the Project site, as it specifically relates to the development project(s) being proposed. As with all Type I actions, and for coordinated review of Unlisted Actions involving more than one agency under SEQRA, a Lead Agency must be established prior to a Determination of Significance.

Upon completion of this Final SGEIS, Part 617.11 requires that each Involved Agency, including the Lead Agency, prepare a written SEQRA Findings Statement (SEQRA Findings) – before any action can be taken on the project including funding or permitting. The Findings will include information on



commitments to mitigation measures and a final determination as to the project's impact on the environment.

As noted in the Draft SGEIS, the potential future development of the Project site is anticipated to require specific approvals and permits during various stages of planning, design, and site development. Many permits and approvals to be issued by Involved Agencies, such as highway work permits from State or County DOTs, will be sought after actual site development plans have been prepared and advanced to the point that specific industrial tenant requirements and project components become known. Project reviews, approvals and permits which may be sought from various agencies include, but are not limited to the following:

- NYSDEC Air Permit (type depending on future tenant(s))
- NYSDEC Threatened & Endangered Species
- NYSDEC Freshwater Wetlands
- NYSDEC 401 Water Quality Certification
- U.S.A.C.E. Section 404 (Waters of the United States)
- Discharge to Surface Water (NYSPDES) 6NYCRR Part 750
- General Permit for Stormwater Discharge from Construction Activity SPDES GP-0-10-001
- Multi-Sector General Permit for Stormwater Discharge Associated with Industrial Activity SPDES GP-0-06-002
- NYSDOT Highway Work Permit (I-81 & NYS Route 31)
- Onondaga County Planning Referral GML 239m
- Onondaga County Department of Water Environment Protection Industrial Waste Discharge Permit
- County Highway Department Work Permit
- County Highway Department Curb Cut Approval
- Town of Clay Subdivision Adjustment (Section 230-28F)
- Town of Clay Planned Development District (PDD) / Zone Change
- Town of Clay Site Plan Review & Approval (Section 230-26)
- Town of Clay Industrial Performance Standard Variance (Section 230-17)
- Town of Clay Accessory Special Permit
- Town of Clay Building Permit
- Town of Clay Certificate of Occupancy
- Town of Clay Demolition Permit







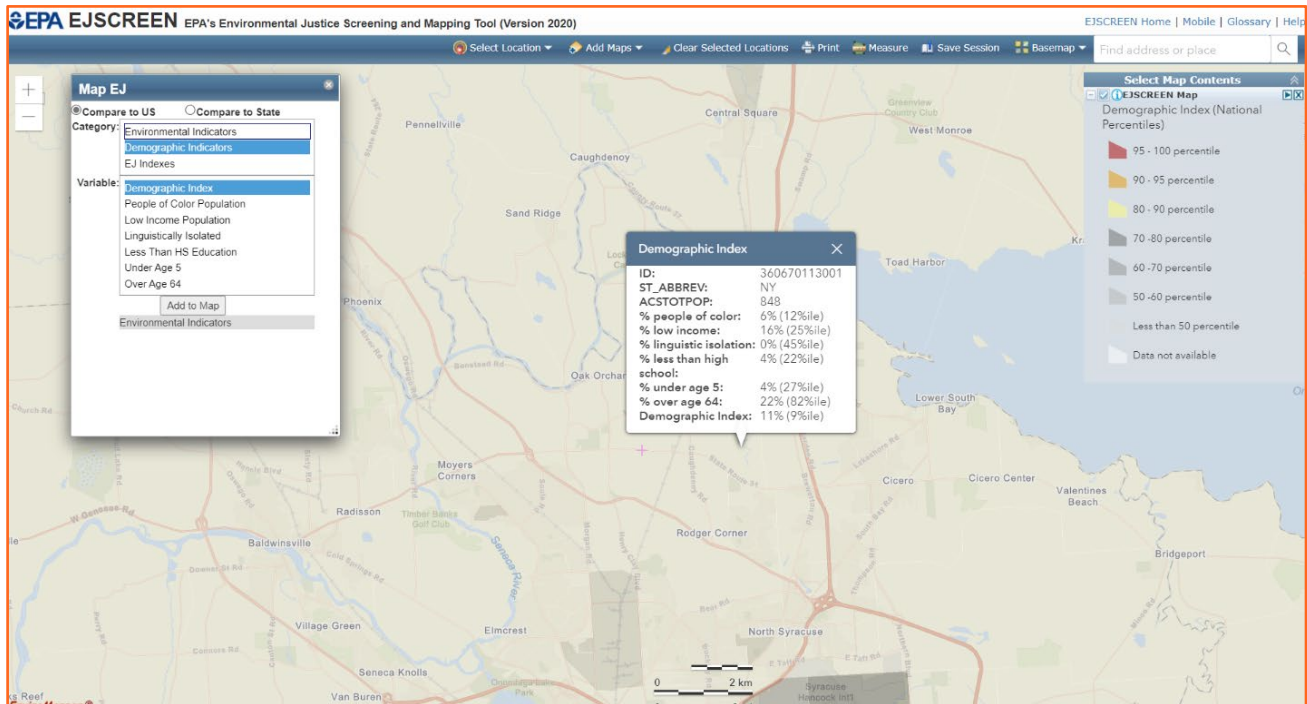


Figure 5.2 – EJSCREEN Map

## 5.2 Transportation

To further expand upon Section 4.3 Transportation from the Draft SGEIS:

The majority of the proposed transportation improvements can be constructed within the existing highway boundary and lie within previously disturbed area. Temporary and permanent easements will be acquired by the owning agency for those areas outside the highway boundary by negotiated agreements or pursuant to the EDPL, as necessary.

Roadway improvements to mitigate the proposed Park cause negligible to minor impacts. The roadway improvements area of potential effects are considered, and their impacts are addressed for each individual resource area within their respective sections in the Draft SGEIS, 3.0 Environmental Setting and 4.0 Potential Environmental Impacts and Mitigation.

Any temporary impacts will be mitigated through proper construction and best management practices. Disturbed areas will be re-graded and reseeded to pre-construction conditions. Overhead utility lines and poles will be relocated prior to construction.

During the preliminary review of the I-81 / I-481 northern interchange (Interchange 29 in Cicero) improvements that are proposed as part of the Interstate 81 (I-81) Viaduct Project, it was determined that the intent of the interchange improvements was to reconstruct the interchange to direct I-81 traffic to the new I-81 (former I-481). The I-81 / I-481 interchange would not affect our transportation study outcomes, therefore was not included in the transportation study area for this Project.

The new trips schematic diagram (Figure 9 of the TIS) has been revised by removing the new trip text at Pardee Road to NYS Route 31. The revised diagram is shown in Appendix D of this Final SGEIS.

Tables 6 -9 of the TIS have been revised to correct a typographic error so that the tables match the Synchro outputs in the Appendices to the TIS. The revised Tables are shown in Appendix D of this Final SGEIS.



## 5.3 Recreation

To further expand upon Section 4.4 Utilities & Community Services from the Draft SGEIS:

### *Parks and Recreation Facilities*

Publicly available data was reviewed to determine if there were any parks or recreational facilities on or in the vicinity of the Park. Although no parks or recreational facilities were identified, there appears to be a snowmobile trail that crosses the Park.

According to the New York State Snowmobile Association (“NYSSA”) Snowmobile Webmap<sup>4</sup>, there is an existing snowmobile trail that intersects the northern portion of the Park. The trail is named C7L and is maintained by Snow Owls, Inc. It is anticipated that the trail would not be impacted by development at the Park as it runs along the power line corridor in the northern portion of the Park and is outside of the Prime Developable Area. If a future tenant proposes a site plan that would impact the snowmobile trail, mitigation or realignment of the trail will be coordinated with the Snow Owls, Inc. at that time.

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<sup>4</sup> The New York State Snowmobile Association. NYSSA Snowmobile Map ([cgis-solutions.com](http://cgis-solutions.com))



## 6.0 SUBSTANTIVE PUBLIC COMMENT AND LEAD AGENCY RESPONSES

### 6.1 Agency Comments Summary

Two State agencies provided comment letters on the Draft SGEIS. Comments were provided by:

- New York State Office of Parks, Recreation and Historic Preservation (SHPO)
- State of New York Department of Transportation Region 3, Syracuse, NY

These agency letters are provided in Appendix C of this Final SGEIS. Agency comments have been summarized below by resource topic. Comments may not appear in their original context or sequence in which they were provided, but are provided verbatim where possible or otherwise noted.

#### New York State Office of Parks Recreation & Historic Preservation (OPRHP)

*Comment 1: OPRHP understands that the Onondaga County Industrial Development Agency does not currently own the entirety of the proposed 1,250-acre White Pine Commerce Park, and that acquisition of the land and development of the Park will take place gradually over time. Based on these circumstances, OPRHP's preferred approach is to review and provide comments tailored to specific development plans, when the conceptual site plans are available.*

Response: Comment noted.

#### New York State Department of Transportation (NYSDOT)

*Comment 1: NYSDOT is reviewing the Traffic Impact Study to ensure that it meets NYSDOT's requirements and provides all the information NYSDOT needs to determine traffic impacts to the State Highway System. Mitigation will be required to address traffic impacts, and all required mitigation must be reflected in site plans prior to approval.*

Response: Comment noted. See also NYSDOT Comment 7.

*Comment 2: A highway work permit will be required for any work within the State Right-of-Way (ROW) along NYS Route 31. The plans that are prepared toward permit issuance must show our ROW boundary. The final project plans must reflect mitigation as may be determined by the Department. The applicant should coordinate with NYSDOT during plan preparation to ensure that the design meets Department standards and requirements. A consultant inspector may be required for this work.*

Response: Comment noted.

*Comment 3: Utility installation within the State ROW will require a utility permit. If feasible, all steps to avoid open cutting a state highway for the water/sewer installation shall be*



***progressed. The plans that are prepared toward permit issuance must show our ROW boundary.***

Response: Comment noted.

***Comment 4: The applicant must provide NYSDOT a copy of the Storm Water Pollution Prevention Plan (SWPPP) for review. No additional stormwater flow into the State's ROW shall be permitted.***

Response: Comment noted.

***Comment 5: The applicant must submit a photometric lighting plan to the NYSDOT. No glare or spillover onto the State ROW will be permitted.***

Response: Comment noted.

***Comment 6: While NYSDOT staff is still finalizing the review comments, but we don't anticipate any major significant issues that will prohibit the development from progressing forward as a project. Having said that, we have determined that additional improvements will be required to offset impacts from the proposed White Pine Commerce Park. There are several feasible improvement options being analyzed within NYSDOT that can address these operational and safety impacts. Once we complete our review, you will be notified of all our comments and recommendations.***

Response: The TIS (See Draft SGEIS, Appendix B) developed as part of the Draft SGEIS evaluates and recognizes the potential operational and safety impact to the transportation network from the Project. The TIS makes recommendations for traffic operations and safety improvements to mitigate for the Park development within the transportation network and, where appropriate proposes crash reduction measures, which includes recommendations at high crash locations. OCIDA will work with NYSDOT to adopt final traffic improvement measures to mitigate the potential operational and safety impacts.

***Comment 7: We've concluded that, as written, the TIS appropriately documents the study area. Within the study area, the TIS offers proposed mitigation for the impacts of the trips generated by the potential development. NYSDOT will follow up with location-specific comments relating to the details of mitigation within the study area. On that point, it is anticipated that additional coordination and communication will take place as this project develops further, to arrive at the specific details of the mitigation. That said, NYSDOT agrees that the TIS is appropriate based upon the information presented.***

Response: Comment noted.

***Comment 8: No site plan was provided as part of the TIS to support the access points, traffic control, and mitigation near the proposed site.***

Response: This is a generic environmental review that was undertaken to evaluate the proposed expansion of the Park and not a specific development proposal. There is no site plan or specific development proposal at this time. Once there is a specific development proposal and a site plan





is available, such that vehicle volumes and movements are more predictable, OCIDA will work with NYSDOT to confirm the exact nature and extent of potential operational and safety impacts associated with the development, evaluate NYSDOT's recommendations and adopt final traffic improvement mitigation measures.

***Comment 9: If no site plan is available, how did the proposed locations of the proposed driveways be derived? Per the Synchro models, the access on Route 31 (Entrance 2) is between Stearns Road and Burnet Road. Are there any impacts to these two intersections from the new development? These two unsignalized intersections were not analyzed as part of the TIS.***

Response: The TIS describes the assumptions it used to develop the potential traffic impacts of the Project, including the proposed driveway locations. It also includes proposed mitigation measures for the area encompassing the Stearns Road and Burnet Road intersections with NYS Route 31. See Draft SGEIS, Appendix B, Section 2.3. See also Response to NYSDOT Comment 8.

***Comment 10: What entrance to the site will be the main truck entrance/exit? Typically for a development of this type, one entrance is dedicated as the main truck access.***

Response: See Response to NYSDOT Comment 8. Once there is a specific tenant or tenants for the Park and a specific development proposal is presented, details concerning truck ingress/egress and main truck access will be determined.

***Comment 11: Synchro inputs show 10% heavy vehicles will use both entrances. However, there are no truck percentages shown for the adjacent intersections such as the Route 31 @ Caughdenoy Rd. intersection. This should have been inputted and distributed in Synchro for at least this intersection based on the truck percentage used for the site.***

Response: See Response to NYSDOT Comment 8. From the NYSDOT Traffic Data Viewer, Figure 5 of the TIS was created depicting 2019 Daily Truck Percentages, showing truck percentages ranging from 3% to 10% along NYS Route 31. From this information, the assumption was applied for 10% heavy vehicle at the entrances; this was the highest percentage of trucks assumed within the Study Area. For the existing peak hour traffic counts, there were zero heavy vehicles traveling through the NYS Route 31 and Caughdenoy Road intersection. Within the TIS, the vehicle demand of the NYS Route 31 and Caughdenoy Road intersection was appropriately grown to reflect the 2024 Build Volumes.

***Comment 12: Depending on truck access and the proposed site plan, additional improvements (turn lanes) at the Route 31 at Caughdenoy Road intersection may be required if a large percentage of trucks will be turning at this intersection to get to the site entrance on Caughdenoy Road.***

Response: See Response to NYSDOT Comment 8.



***Comment 13: In the new trips schematic diagram, why are there so many new trips coming from Pardee Road to Route 31? I believe this is an error in the diagram only.***

Response: This is a typographic error only in the new trips schematic diagram (Figure 9 of the TIS). The diagram has been revised by removing the new trip text at Pardee Road to NYS Route 31. The revised diagram is shown in Appendix D of this Final SGEIS.

***Comment 14: What is proposed for restrictions for all the commercial driveways on Route 31 between Route 11 and I-81 SB Ramp? The addition of a 2nd WB left turn lane on Route 11 will make it near impossible for vehicles to make a left to/from the driveways on both sides of Route 31.***

Response: See Response to NYSDOT Comment 8.

***Comment 15: In the synchro models, there are stop-controlled driveways just to the west and east of the I-81 ramps. Assumed it's in the models for balancing volumes? There is no explanation in the TIS regarding them.***

Response: Stop-controlled driveways were used just to the west and east of the I-81 ramps in the Synchro models for balancing volumes.

***Comment 16: In 2024 & 2044 Synchro models, the simulation shows motorists are unable to exit the driveway for the gas station (opposite Empower Credit Union) because the volume on Route 31 is so heavy. Assumed this driveway is for balancing volumes too or is this to mimic the commercial driveways in this section?***

Response: Stop-controlled driveways were used in the Synchro models for balancing volumes; they were not meant to mimic the commercial driveways in this section.

***Comment 17: Proposed AM models shows excessive queuing on Route 31 WB at Route 11 as result of the phase change and added volumes. See additional details on this comment on page 2 under Technical Comments.***

Response: See Response to NYSDOT Comment 8. The selected mitigation at NYS Route 31 at US Route 11 and the southbound ramps of I-81 accommodates the trips added, LOS and arterial speeds based on assumptions made for this Study. See Draft SGEIS, Appendix B, Section 5.6 and Table 4. The EB queue at Route 11 is caused by the high EB Right volume at I-81 SB on-ramp.

***Comment 18: Storage length of 125' for NB Right turn should be increase to at least 350'+ based on the 95th percentile queue length. See additional details on this comment on page 3 under Technical Comments.***

Response: See Response to NYSDOT Comment 8. The northbound double right turn lane is analyzed as No Right Turn on Red along with staggered double turn lane storage lengths (125'/500'). Following the NYSDOT HDM Chapter 5.2.3, SimTraffic, is used to report queues since Synchro underestimates queues in oversaturated conditions. The results provided follow those methods described in HDM (as detailed on page 4 of the TIS within Appendix B of the Draft SGEIS) and not results directly from Synchro.





***Comment 19: For Route 31 @ Lakeshore Road, only 2024 AM and PM were analyzed. 2044 was not like all the other studied intersections within the TIS.***

Response: The existing configuration of NYS Route 31 at Lakeshore Road intersection is analyzed to year 2044. See Draft SGEIS, TIS Tables 4, 8, and 9 and Appendix G. The analyzed data comparing the 2024 Build and 2044 Build with Development Scenarios supported the preparation of the proposed five Alternatives at the NYS Route 31 & Lakeshore Rd intersection. See also Response to NYSDOT Comment 8.

***Comment 20: Many LOS and queue lengths in the Synchro files do not match LOS & queue tables for various intersections and alternatives. This mainly occurred for the some of the intersections in Cicero.***

Response: This is a typographic error only in Tables 6 - 9. The Tables have been revised. The revised Tables are shown in Appendix D of this Final SGEIS.

***Comment 21: The trip distribution only shows 10% of the trips to utilize the Route 481 at Caughdenoy and Maple intersection. This location has an existing crash pattern and has a high potential to be used more than what's estimated in the TIS because how close it is to the site. Higher volumes here will most likely correlate to an increase in crashes if not addressed as part of the improvements. See additional details on this comment on page 4 under Technical Comments.***

Response: See Response to NYSDOT Comment 8. The trip distribution model showing that 10% of trips utilizing the Route 481 at Caughdenoy and Maple intersection was provided from the Syracuse Metropolitan Transportation Council (SMTC) as described on page 18 of the TIS. See Draft SGEIS, Appendix B.

***Comment 22: NYSDOT has provided additional mitigation options that could be considered beyond what has been proposed to mitigate for the transportation impacts of this Project. These additional options included modifications to NYS Route 31 and various intersections within the traffic study area as well as improvements to NYS Route 481 at Caughdenoy Road and Maple Road. Additionally, NYSDOT provided input on the preferred Alternatives at NYS Route 31 and Lakeshore Road.***

Response: See Response to NYSDOT Comment 8.

## 6.2 Public Comments

Comments were received from 31 individuals during the Public Hearing that was held virtually on May 24, 2021. The complete transcript of the Public Hearing including verbal comments from attendees are provided in Appendix B of this Final SGEIS. Written public comments are provided in Appendix C of this Final SGEIS.

In total, there were 74 comments received from the general public on the Draft SGEIS, some of which were duplicates, for a total of 64 commenters from the general public, some in support of the Project and others opposed, which included three (3) comments from local elected officials.



**SUMMARY OF PUBLIC COMMENTS SUBMITTED TO OCIDA**  
**WHITE PINE COMMERCE PARK DRAFT SUPPLEMENTAL GENERIC**  
**ENVIRONMENTAL IMPACT STATEMENT**

**Purpose and Need**

- 1. General statements were made in overall opposition to the project, including that the project is not needed.*

Response: As detailed in the Draft SGEIS, OCIDA, as Project Sponsor, proposes to expand its business park known as White Pine Commerce Park to approximately 1,250± acres. The expanded Park will be capable of supporting a mix of industrial and/or commercial uses that may include industrially related office, research, manufacturing, assembly, warehousing, data management, material processing and distribution facilities in a campus-like setting.

Based on OCIDA's concerted efforts to market the Park since the 2013 GEIS, it became evident that the existing Park was too small to attract a broader scope of industries such as the semiconductor industry, which require a large campus setting with greenspace and ample buffering from environmental receptors and would bring high tech and high paying jobs to Onondaga County. As a result, the proposed expanded footprint of the Park will allow OCIDA to market the Park to a larger, more diverse mix of industries than it had previously and facilitate OCIDA's main objective in originally developing the Park.

- 2. The potential business growth associated with the project, and the employment opportunities it provides, will mean an increase of residential construction jobs, along with associated tax revenue generation.*

Response: Comment noted. This is one of OCIDA's long-term objectives in developing the Park and why this Project is so important to Onondaga County.

- 3. Advanced manufacturing could transform the local economy. This could attract new direct investment and new jobs. Attracting this size and scale of investment would put the area back on the international map, and would offer opportunity for downstream spin-off technology jobs. There will also be potential benefits of collaborations between academic and private sector in research and workforce development.*

Response: Comment noted. Development of the Park has the potential to result in numerous benefits for Onondaga County which is why this Project is so important.

- 4. Several commenters stated that the Project has the potential to attract new jobs, including good paying supply-chain jobs, including construction jobs, who work with the prospective tenants, and be an overall positive economic driver for the region.*

Response: Comment noted. This is one of OCIDA's long-term objectives in developing the Park and why this Project is so important to Onondaga County.



***5. The project has been explored for many years and will not come to fruition. It is a pipe dream. There is money being spent for an unknown buyer or tenant.***

Response: OCIDA recognizes that the Park has yet to be developed. This is not, however, because it is a pipe dream. Rather, based on its concerted efforts to develop the Park and secure tenants, OCIDA has determined that the existing Park footprint is inadequate to successfully market the Park to a larger, more diverse mix of potential industrial and commercial developers. This is the exact reason why OCIDA is pursuing this Project to expand the Park. An expanded Park will be capable of supporting a mix of industrial and/or commercial uses with related office space, advanced state-of-the-art research, large- or small-scale manufacturing, assembly, warehousing, data management, material processing and distribution facilities in a campus-like setting that the existing Park footprint is not able to support.

***6. The local community does not want the project, as evidenced by the petition currently circulating, and growing number of Facebook group members.***

Response: OCIDA recognizes that there has been opposition to the Project and has thoroughly considered the concerns that have been raised and have addressed them as part of its environmental review under SEQRA. Indeed, all of the concerns that were raised during the comment period for the Draft SGEIS have been evaluated and addressed in this responsiveness summary. Further, OCIDA did not receive a copy of any petition opposed to the Project either during the public hearing or the public comment period.

OCIDA would note that while there have been members of the public that have expressed their opposition to the Project, there have also been members of the public in support of the Project.

***7. Job creation can occur without displacing people and destroying a community.***

Response: While job creation can occur in other contexts, the type of job creation anticipated for the expanded Park is significant. OCIDA diligently tried to develop the Park as originally sized and was unsuccessful. In order to successfully develop the Park and bring the economic benefits sought by OCIDA's mission, the Park needs to be expanded to generate much needed tax revenue, create several thousand jobs and further economic development in the area.

As detailed in the Draft SGEIS, OCIDA explored a number of other alternatives that would avoid the potential need to acquire lands pursuant to Eminent Domain Procedure Law ("EDPL") to further expand the lands owned by OCIDA to support future development. However, each of these alternatives were deemed inappropriate as they did not adequately meet the purpose or need of this Project. See Alternatives of the Draft SGEIS, Ch. 2.

OCIDA does not take its power of eminent domain lightly. OCIDA's preference has always been and remains to come to agreements with landowners whose property is needed for the Project whereby the landowner is fully compensated for their home and any disruption to their lives that moving may cause. Eminent domain will only be used as a last resort.



Furthermore, the Draft SGEIS details the Project's consistency with the community character, including OCIDA's plans to work with the Town of Clay Town Board and/or Planning Board to identify specific issues or areas of concern and develop specific measures to address or alleviate such concerns to ensure the objectives of the Project are achieved while also minimizing or mitigating development related impacts on the surrounding community.

***8. General statements were made concerning providing tax breaks to the developer. The taxpayers cannot afford to provide a tax benefit to the developers of the site. This is an inappropriate use of tax dollars.***

Response: Comment noted. The comment raises an issue that is outside the scope of OCIDA's environmental review of the Project under SEQRA. See 6 NYCRR § 617.1(b), (c) ("The basic purpose of SEQRA is to incorporate the consideration of environmental factors into the existing planning, review and decision-making processes of State, regional and local government agencies at the earliest possible time. To accomplish this goal, SEQRA requires that all agencies determine whether the actions they directly undertake, fund or approve may have a significant impact on the environment[.]"); see, generally, N.Y. Env. Conserv. Law Art. 8.

***9. The project may generate high tech jobs but it will not support the current residents. The high tech jobs are not sustainable. There are not enough locally trained employees.***

Response: Future development of the Park is expected to significantly benefit Onondaga County and its residents. As in other locations in New York (e.g., GlobalFoundries and Cree), the targeted semiconductor industry will create a marketplace for high-tech, high-paying jobs. It is anticipated that future tenants will draw from current residents that have the requisite experience when hiring. Additional labor will be imported as necessary as the commenter is correct that there are currently not enough locally trained employees. However, the goal is to bring a long-term tenant to the Park that will continue to provide ample employment opportunities for the foreseeable future. Further, it is anticipated that future tenants will partner with local colleges and engineering programs to train qualified workers.

In addition to these short- and long-term employment opportunities and benefits, development of the Park is anticipated to further benefit Onondaga County residents. The development of the expanded Park or any surrounding areas that develop as a result of development at the Park could create positive cumulative impacts and economic spin-off. This could include an increase in employment opportunities, increases in local discretionary spending providing additional sales tax revenues to State and local governments, demand for new goods and service support businesses, and further diversify the tax base of the Town of Clay and Onondaga County. The Luther Forest campus for GlobalFoundries in Malta, New York is a prime example.

***10. The buildings will likely be abandoned in the future. Manufacturing in New York is not sustainable. While there is a shortage of chips now, that may not be the case in the near future. There are concerns that if the buildings are abandoned, who will own them and be responsible for their upkeep, and who will own the land.***

Response: Chips are an essential part of everything that we do in the modern era. As technology has advanced, semiconductor chips have spread from computers and cars to toothbrushes and tumble dryers.



Today, demand for chips is continuing to outstrip supply and there is a severe global chip shortage. The need and demand for chips, particularly in the United States, are extremely strong and are only expected to increase over time.

Just last year, then President Trump signed into law the Creating Helpful Incentives to Produce Semiconductors for America Act (CHIPS for America Act), a bipartisan piece of legislation that would invest tens of billions of dollars in semiconductor manufacturing incentives and research initiatives over the next 5-10 years to strengthen and sustain American leadership in chip technology, which is essential to our country's economy and national security.

More recently, on February 24, 2021, President Biden signed Executive Order 14017, directing a whole-of-government approach to assessing vulnerabilities in, and strengthening the resilience of, critical supply chains, including the supply of chips. And, on June 8, 2021, the U.S. Senate adopted a major piece of legislation, known as the "U.S. Innovation and Competition Act," that would direct \$52 billion in emergency spending toward domestic semiconductor chip manufacturing in furtherance of its goal to incentivize U.S. manufacturing of the chips, which currently are primarily produced overseas. The Biden Administration views the current chip shortages plaguing the global economy as a national security issue.

In short, there is long-term demand for chips and the Park, once expanded to sufficient size, is uniquely situated to site a tenant in the semiconductor industry. *See* Response to Alternatives Comment 1. Furthermore, semiconductor manufacturers have proven stable and sustainable in other locations in upstate New York including Cree in Marcy, NY and GlobalFoundries in Malta, NY. GlobalFoundries has invested \$15 billion in upstate New York development in the last decade and recently announced they are relocating their headquarters from California to Malta, NY.

It is anticipated OCIDA will own the properties that make up the White Pine Commerce Park. Once a developer is proposed, OCIDA will work with the developer to create a leasing agreement that will identify maintenance responsibilities for the property and the buildings located in the Park.

***11. The site is essentially shovel ready, and is nationally recognized, having available electrical capacity, access to water, highway access, broadband, and the ability to host the a high tech facility with minimal impacts.***

Response: Comment noted.

***12. The project will have ancillary benefits such as bringing in high school age and college age kids to fill currently vacant restaurant positions.***

Response: Comment noted.

***13. There is no proof that a facility of this kind will benefit the area in which it is located.***

Response: For many years, OCIDA has devoted substantial time and effort into developing the Park, with a particular focus on development that will bring high-tech facilities and high paying jobs to Onondaga County. This includes, more recently, the possibility of a tenant in the semiconductor industry. OCIDA's



efforts have looked at the potential benefit of such a facility to Onondaga County and has concluded that, if the Park is expanded and can attract a tenant from the semiconductor industry, that the benefit to Onondaga County in terms of tax revenue and high paying jobs is significant. For example, the economic impact of GlobalFoundries on Saratoga County NY from 2010 to 2019 includes (i) the number of employers increasing 12.2%, (ii) the number of people working in the County increasing 21.9%, and (iii) the per capita income of County residents rising 48.7% (Federal Reserve Economic Data (“FRED”). At the time they issue their SEQRA findings statement, OCIDA will weigh and balance this anticipated social and economic benefit with the potential environmental impacts.

***14. OCIDA’s mission statement does not belong in the EIS, as it has no bearing on environmental impact, and does not justify harming the environment by converting the properties into industrial property, displacing neighborhoods and destroying the rural character of the area.***

Response: OCIDA respectfully disagrees. OCIDA’s mission is pertinent to the purpose and need of the Project. *See also* Response to Purpose and Need Comment No. 7.

***15. There is no specific plan. The EIS is vague.***

Response: Comment noted. As this is a generic environmental review, there are no specific site plans or development concepts proposed for the Park. SEQRA does not require final site plans within a generic EIS. Instead under SEQRA, a generic EIS should contain enough detail on size, location, and elements of the proposal to understand the proposed action and the associated impacts, and to determine the effectiveness of any proposed alternatives or mitigation. Because potential future site-specific actions following a generic EIS are often speculative or unknown, potential impacts of those future uses are often best discussed in terms of hypothetical scenarios and do not include or evaluate specific site plans or site layouts as was done within the Draft SGEIS. *See* 6 NYCRR § 617.10.

Once a specific development is proposed for the Park, it will require site plan review and approval from the Town of Clay Planning Board and will be subject to any other Town of Clay land use and zoning regulations. Any specific site plan will be evaluated for consistency with this Final SGEIS and SEQRA will be complied with at that time.

***16. The EIS did not identify what tax breaks or financing options that OCIDA will offer the tenant or tenants in the semiconductor industry. OCIDA should provide estimates for the stimulus provided to the local economy in comparison to the tax abatements they are prepared to offer.***

Response: *See* Response to Purpose and Need Comment No. 8.

***17. History has shown there are high environmental consequences to overbuilding in virgin, or green, territories. There will future costs in correcting environmental mistakes.***

Response: OCIDA has considered other alternative locations and determined that the Park is the preferred alternative. OCIDA takes its responsibility very seriously and has thoroughly evaluated the potential for





significant adverse environmental impacts from future development of the Park. As part of this evaluation, including the 2013 FGEIS and the Draft SGEIS, OCIDA looked at ways to avoid, minimize and mitigate environmental impacts to the maximum extent practicable. Impacts and mitigation for individual resource areas are addressed within Chapter 4.0 of the Draft SGEIS. Irreversible and irretrievable commitment of resources are discussed in detail in Chapter 8.0. Future development of the Park, including any construction and operation, will be required to comply with all local, state, and federal environmental laws and regulations. All applicable permits and approvals will be obtained prior to commencement of development. Any potential adverse environmental impacts would be minimized through best management practices and any potential long-term environmental consequences would be avoided by adhering to the approved permits and plans for the Park.

***18. Comments were made regarding funding the project with tax dollars with no guarantee that the project will materialize. Also, is the project dependent on Federal monies, and whether it will go through with Federal monies. Will OCIDA be offering PILOT agreements or other funding?***

Response: See Response to Purpose and Need Comments 8 & 15. Funds used by OCIDA, to-date, for the Project are for the purpose of expanding the footprint of the Park to make it attractive to future development. This is part and parcel of OCIDA's mission to stimulate economic development, growth, and general prosperity for the people of Onondaga County by using available incentives, rights, and powers in an efficient and cooperative manner. The goal is to benefit Onondaga County by bringing high-tech facilities and high-paying jobs to Onondaga County. It is anticipated that there will be government incentives and funding to support development at the Park when a specific development is proposed.

***19. Complex manufacturing drives innovation and technology enabling safer healthcare, sustainable agriculture, electronic vehicles and transportation, solar production, storage, and low power devices that enable a sustainable planet. The U.S. is taking steps to become a leader in technology fabrication. Chips are critical for supply chain stability and national security.***

Response: Comment noted.

***20. Semiconductors and microcontrollers are major core components of drones that assist first responders. The components are needed for this expanding business, and it is positive to build out the capability locally. The project will attract talent into the region that will support other local high technology businesses.***

Response: Comment noted.

***21. The significant assets National Grid already has near the site make it uniquely suitable for the development of high tech manufacturing.***

Response: Comment noted.



***22. The size, location and capabilities of the regional workforce, area colleges and local manufacturing base make the site highly competitive with other regions of the country.***

Response: Comment noted.

***23. “Reshoring” or bringing back this type of manufacturing will support a number of industries, including the auto industry and the phone industry, which are hurting now.***

Response: Comment noted.

***24. Often members of building and construction trade industries must travel to where the construction is, outside the county and out of state. Having high tech manufacturing here is game changing.***

Response: Comment noted.

***25. Hundreds of jobs will be created through each phase of construction of the site, which will also make it possible for construction and other trades to recruit apprentices, and provide opportunities to learn trades that will lead to lifelong careers.***

Response: Comment noted.

***26. Semiconductor and advanced manufacturing is sustainable, when you think that 3,000 microchips are needed for the average car.***

Response: Comment noted.

***27. The advanced manufacturing facilities in Onondaga County, and the jobs they have generated, has demonstrated the potential benefits of bringing advanced manufacturing to the White Pine site. It will attract talent to the area, which will enhance employee retention due to a better climate for professionals and their families and improved service at the Syracuse airport.***

Response: Comment noted.

## **Land Use/Zoning**

***1. Several commenters made statements there is no room in the Town of Clay to accommodate the facility, along with additional residences for employees. The Town of Clay is crowded.***

Response: There is sufficient room in the Town of Clay to accommodate development of the Park. As detailed in the Draft SGEIS, residential and commercial development in northern suburbs of Onondaga County is likely to continue, according to the most recent studies conducted by the Town of Clay, the Syracuse-Onondaga County Planning Agency (“SOCPA”), and the Syracuse Metropolitan Transportation Council (“SMTTC”). These studies include a corridor study conducted in 2010 by the SMTTC titled Clay-Cicero Route 31 Transportation Study, the Town of Clay Northern Land Use Study prepared in 2013, and the 2010 Development Guide for Onondaga County. New residential development has occurred south and east of the Park, primarily along the NYS Route 31 corridor in the Town of Cicero. The population of the





Town of Clay has remained largely unchanged over the past two decades decreasing 0.84% since 1990. Additionally, the Town of Cicero had a 2019 population of 30,721 people, a decrease of 2.89% since 2010. The SOCPA, SMTA, and Town of Clay studies assume future growth in the project area and account for future industrial use of the Park. *See* Draft SGEIS, Section 4.1.

Additionally, SOCPA is currently updating the County's Comprehensive Plan and expects to finalize the plan later this year. Based on information obtained from SOCPA on April 7, 2021, the Comprehensive Plan will promote new opportunities to strengthen communities and options near the Park, including the creation of town centers, enhanced transit and transportation options, and complete neighborhood concepts. Once a future tenant is identified for the Park, the County Comprehensive Plan will be reviewed to identify any goals or objectives from the Plan that should be considered for implementation into the future development of the Park

- 2. Comments were made regarding naming the park White Pine Commerce Park. It should not carry this name.***

Response: Comment noted.

- 3. Concerns were raised that there are no updated site plan or concept drawings.***

Response: *See* Response to Purpose and Need Comment 15.

- 4. The northern area of the Town of Clay should not be a manufacturing hub.***

Response: Comment noted. However, as detailed in the Draft SGEIS, the Park is a prime location for development given its size (including a significant area of prime developable land) and proximity to key utility services and transportation corridors. *See also* Response to Alternative Comment 1.

- 5. There is a solar field in the area.***

Response: Comment noted. The comment does not identify any specific solar field. The closest existing solar field is approximately 2 miles away and not anticipated to have any cumulative impacts.

- 6. Questions were presented regarding the status of the proposed rezoning from Agricultural to Industrial. Given the investment of time, effort and money into the project, OCIDA must have received assurances that rezoning would be approved. What is the status of the project if rezoning is not approved?***

Response: OCIDA has not received any such assurances, which would be premature given the ongoing environmental review under SEQRA. As stated in the Draft SGEIS, Section 4.1 Land Use & Zoning, page 4.1, "In furtherance of the Project, OCIDA will pursue approval by the Town of Clay Town Board of either a zone change to I-2 for the portion of the Park that is not zoned I-2 or a PDD that encompasses the entire Park footprint to allow the type of uses OCIDA seeks for the Park."



- 7. Concerns were expressed that blanket zoning provisions provide notice to future developers regarding a town's desired land use patterns, but they do not allow for public input regarding the full range of impacts a proposed project may have on the community, which is a necessary and important part of the environmental review process.***

Response: Some form of zone change, as discussed in the Draft SGEIS, will be required. Once that process commences, it is anticipated that there will be sufficient opportunity for public input and review through the Town of Clay process as outlined in its Zoning Code for either a Planned Development District (“PDD”) or a zone change. Furthermore, public input has been considered as part of this SGEIS.

- 9. A commenter noted that the residential properties that have been or will be acquired by OCIDA through voluntary purchase agreements or pursuant to EDPL will be rezoned, which will require SEQRA review through the Town of Clay.***

Response: All property acquisitions by OCIDA have or will comply with SEQRA. Any rezoning deemed necessary, or alternatively the development of a PDD, will be covered by OCIDA’s coordinated environmental review of the Project as the Town of Clay is an Involved Agency and has agreed to OCIDA’s role as lead agency. To that end, any rezoning or approval of a PDD by the Town of Clay will require the Clay Town Board to issue its own Findings Statement under SEQRA.

## **Community Character**

- 1. Construction will permanently alter the natural farm land, woods and wetlands. The resources are irretrievable.***

Response: OCIDA recognizes that development of the Park will result in certain irretrievable and irreversible impacts. These were evaluated in the 2013 FGEIS and again in Section 8.1 of the Draft SGEIS. The irreversible commitment of physical resources will include the conversion of approximately 400-acres of the expanded Park to building footprint and additional support facilities in support of potential advanced manufacturing uses.

As explained in Chapter 8.0, the prime developable area of the Park generally consists of fields, shrub land, and some woodland areas. There are no designated agricultural districts within the Park. Residential properties may also comprise the developable area. Consistent with New York State and federal wetland policies, OCIDA’s goal for future development is to avoid, to the extent practicable, development within regulated wetland areas. A portion of the site is unencumbered by regulated wetland areas, which facilitates achievement of this goal. If wetland encroachments are necessary, minimization of impacts will be the next priority. Encroachments will require permits from the New York State Department of Environmental Conservation (“NYSDEC”) and U.S. Army Corps of Engineers (“USACE”). Permit issuance would require the replacement of wetland functions through wetland creation (on-site north of the power lines) and/or purchase of wetland credits (a wetland mitigation credit is a unit of trade used to offset ecological losses that occur in areas regulated by the USACE). *See also* Draft SGEIS Section 4.0 (detailing mitigation for each specific environmental resource).



***2. Neighborhoods and developments have grown up around project area since it was originally conceived and while it has sat idle. The community character has changed.***

Response: Comment noted. This was one of the changes in circumstances since the 2013 FGEIS that was evaluated in the Draft SGEIS. See Draft SGEIS, Section 1.2.3. The area surrounding the Park and community character of the Park as it exists now was detailed in Sections 3.1 and 3.2.

***3. The community will not remain intact. The project will permanently impact the character of the area.***

Response: To avoid or minimize potential adverse impacts to the extent practicable, the potential future development of the expanded Park will occur subject to the design features, conditions, and mitigation measures required by the Town of Clay Town and Planning Boards in accordance with the requirements of the Zoning Code. In conjunction with either a zone change or PDD approval process, OCIDA and/or the future tenant will work with the Town Board and/or Planning Board to identify specific issues or areas of concern and develop specific measures to address or alleviate such concerns to ensure the objectives of the Project are achieved while also minimizing or mitigating development related impacts on the surrounding community. See Draft SGEIS, Sections 3.2, 4.2.

***4. Section 3.2 Community Character inadequately addresses the population demographics and does not adequately include describe patterns of population concentration.***

Response: The general population density of the surrounding area was detailed as follows

[The Town of] Clay is the largest town in Onondaga County occupying approximately 48 square miles with a 2019 Census population of 59,250 people. The population of the Town has remained largely unchanged over the past two decades decreasing 0.84% since 1990. The area surrounding the Park is sparsely populated with relatively low-density residential development mostly along Caughdenoy Road and Verplank Road west of the Park, Mud Mill Road north of the Park and Burnet Road within and near the eastern boundary of the Park.

See Draft SGEIS, Section 1.1.4. This has been supplemented with additional population demographics in the Final SGEIS. See Final SGEIS, Section 5.1.

***5. Section 4.2.1, Community Character impacts, mentions that 3 dozen residential properties will be acquired and that homeowners will need to relocate. A development time frame needs to be prepared.***

Response: See Response to Purpose and Need Comment 15. Once a specific tenant or tenants and a specific proposal is presented to develop the Park, a development timeframe will be prepared. At this juncture, it is OCIDA's hope that once the Park is expanded and can accommodate a high-tech tenant in the semiconductor industry, that its long-standing efforts will be successful and development will be able to proceed in a relatively quick timeframe.



6. *Section 4.2.2, Community Character mitigation, contains no discussion about why the homes need to be acquired, what the land will be used for, when this will take place, or any other alternatives that may preserve Burnett Road. Furthermore, the DGEIS does not address all closing costs, relocation, or buyers' cost for a new home. It is entirely unreasonable for people who are involuntarily displaced to shoulder such costs. This is not mitigation.*

Response: Comment noted. The mitigation section is not intended to address these topics. The need for the land is discussed throughout the Draft SGEIS. *See, e.g.,* Draft SGEIS, Section 1.1.3, 1.1.5 and 1.2.2. Alternatives are discussed in Section 2.0, specifically Alternative 2 (the Park as it was originally proposed in the 2013 FGEIS, Alternative 3 (utilizing a smaller expanded area) and Alternative 4 (considering a different location to site the Park). *See* Draft SGEIS, Section 2.0.

OCIDA's preference has always been and remains to come to an agreement with any landowner whose property is needed for the Project whereby the landowner is sufficiently compensated for their property and the need to move. *See also* Response to Eminent Domain Comment 1. To the extent eminent domain is pursued, any and all property acquired pursuant to the eminent domain process will be valued at its highest and best use at the time of any such taking consistent with the obligation to pay just compensation pursuant to the Eminent Domain Procedure Law and United States and New York Constitutions. *See also* Response to Eminent Domain Comment 8.

## **Alternatives**

1. *Several comments were made suggesting alternative locations should be explored for the Commerce Park, including further west down Route 31, properties south of Route 31, north of the utility easement, and areas generally outside the Town of Clay, away from surrounding populated residential areas in Cicero.*

Response: SEQRA requires that an environmental impact statement include "a description and evaluation of the range of reasonable alternatives to the action that are feasible, considering the objectives and capabilities of the project sponsor." 6 NYCRR § 617.9(b)(5)(v). "The purpose of requiring inclusion of reasonable alternatives to a proposed project is to aid the public and governmental bodies in assessing the relative costs and benefits of the proposal." *See Webster Assoc. v. Town of Webster*, 59 N.Y.2d 220, 228 (1983). To be meaningful, such an assessment must be based on an awareness of all reasonable options other than the proposed action. The degree of detail with which each alternative must be discussed will, of course, vary with the circumstances and nature of each proposal." *Id.*; *see also Webster Assoc. v. Town of Webster*, 59 N.Y.2d 220, 228 (1983). The regulations direct that an EIS be "analytical," but that it need not be "encyclopedic." 6 NYCRR § 617.9(b)(1).

Here, as part of its prior environmental review of the Park, which culminated in a Final Environmental Impact Statement ("FEIS") and Findings Statement in 2013, OCIDA considered a number of alternatives, including a no action alternative, alternative sites, alternative uses and technologies, alternative scale, timing and magnitude of development, and alternative site design and layout. *See* 2012 Draft GEIS, Section 2.0.



Beginning in 1991, OCIDA considered several locations for the development of an Industrial Park, including conducting a Feasibility Study at that time. Then, as part of OCIDA's prior SEQRA review of the Park, OCIDA again considered alternatives, specifically alternative locations. Ultimately, it was concluded in 2013 that the Park was the preferred location.

As explained in the Draft GEIS, as adopted in the 2013 FGEIS,

The Clay Business Park site is somewhat unique from these and other industrial and business park locations in Onondaga County. As a relatively large, highly developable site that is zoned for large-scale industrial uses, the Clay Business Park provides a setting for advanced manufacturing that may require large amounts of electricity and rail for its operations. These uses cannot be easily accommodated by other sites in the region. (Section 2.2.1).

The Draft GEIS, as adopted in the 2013 FGEIS, further concluded that:

The Clay Business Park property affords sufficient space to develop large-scale industrial uses in excess of two million square feet, and is unique in this respect. The site is conducive to industry due to its location adjacent to the existing CSX rail line and access from NYS Route 31 with interstate access available to the east (I-81) and west (I-481). The site can accommodate large-scale electrical and water demand. Because other locations cannot readily accommodate large-scale industrial use the OCIDA is moving forward with planned development of the site to make it "shovel ready" for industrial tenants and has dismissed other locations from consideration as not meeting these same attributes and requirements. (Section 2.2.1).

Ultimately, OCIDA adopted the 2013 FGEIS and issued a Findings Statement which concluded, among other things, that the Park was the preferred location for the project. As a result, the Park was created to be capable of supporting a mix of industrial and/or small commercial uses with related office space, advances state-of-the-art research, large- or small-scale manufacturing, assembly, warehousing, data management, material processing and distribution facilities in a campus like setting. This background served the basis for the alternatives analysis in the Draft SGEIS.

The purpose of the Draft SGEIS was to evaluate the potential impacts of expanding the geographic footprint of the Park to make it an attractive and viable site that will bring high-tech facilities and high paying jobs to Onondaga County. In the Draft SGEIS, therefore, OCIDA revisited its prior alternatives analysis and evaluated the following:

1. No-action alternative (Draft SGEIS, Section 2.2) – The no action alternative would result in the Park remaining open space and potential habitat for common wildlife that is inaccessible and unutilized by the community until it is sold for other purposes. This alternative would avoid the potential need for to acquire lands pursuant to the EDPL to further expand the lands owned by OCIDA to support future development.
2. The Park as Considered in 2013 (Draft SGEIS, Section 2.3) – This alternative would keep the size of the Park to 340± acres, which is roughly 911± acres smaller than the currently proposed 1,250± acre expanded Project site.



3. Smaller Expansion (Draft SGEIS, Section 2.4) – A smaller expansion alternative, would allow for development on only a portion of the Project site, potentially keeping the remainder of the site in its current state, as vacant, undeveloped land or residential homes, and could reduce, or potentially avoid, the potential need to use EDPL to acquire lands.
4. Alternative Location (Draft SGEIS, Section 2.5) – Creation of a new Park at a different location, which would effectively leave the existing Park vacant as is and thus resulting in either no development at that site or a smaller development footprint.

Based on this analysis, the proposed Project was deemed preferred. More specifically, expansion of the existing Park was deemed preferred over restarting a new park at an alternative location.

First and foremost, the Park already exists and represents a substantial footprint of prime developable land that is appropriately zoned for industrial development. To start anew would effectively render the existing Park unusable as OCIDA's long-standing efforts to develop the Park as intended in 2013 have proved fruitless. Further, after looking at alternative sites for the last 20 years, OCIDA has determined that there are no other viable locations in Onondaga County that meet the stated purpose of the Project, which is to bring high-tech facilities and high paying jobs to Onondaga County in furtherance of OCIDA's mission. None of these previously considered alternative locations or those raised in the comments would be able to accommodate the large-scale industrial use the Park is promoting due to size limitations and proximity to services and necessary infrastructure.

Unlike other park locations, the expanded Park can accommodate large-scale industrial tenants that cannot easily locate elsewhere in Onondaga County due to their size and space requirements and need for suitable infrastructure. To OCIDA's knowledge, there are no other sites in Onondaga County to accommodate a developer from the semiconductor industry that contain sufficient land acreage and proximate to the necessary electric, gas, water and wastewater infrastructure.

Key aspects of the Park include the following:

- National Grid's Clay Substation is located adjacent to the Park on the west side of Caughdenoy Road. This existing substation is a major hub for high-voltage bulk power transmission and the estimated Project demand of 500 MVA is within the levels that National Grid has indicated can be provided. *See Draft SGEIS, Section 4.4.1 & Appendix C.*
- The Oak Orchard Wastewater Treatment Plant is located approximately 2.5 miles west of the Park and can accommodate the estimated sanitary sewer discharges from potential development of the expanded Park. *See Draft SGEIS, Section 4.4.1.*
- The Park is bisected by a 54-inch water main OCWA has indicated that there is sufficient public water service to meet the expanded Park's estimated water demand. *See Draft SGEIS, Section 4.4.1 & Appendix C.*





- NYS Route 31, which is a principal arterial west of Interstate-81, is located adjacent to the Park. This provides a crucial transportation network to service prospective tenants.
- An existing CSX rail line crosses the northwestern corner of the Park generally in a northeast/southwest direction.

The points coupled together with the lack of other viable locations within the County to accommodate the intended scale of the Park, and OCIDA's already substantial investment in the Park, confirm that other alternative sites are neither preferred nor viable.

Notably, local development plans have consistently identified the Park as a location for industrial development expansion including the *Town of Clay Northern Land Use Study* (2013) and the *Development Guide for Onondaga County* (2010).

- 2. There are many abandoned properties or vacant properties (such as Great Northern Mall and Shoppingtown Mall), and other existing locations with available infrastructure, throughout the County that are available to develop that were not explored.***

Response: See Response to Alternatives Comment 1.

- 3. All the presented proposed alternatives, and additional alternatives such as an 800-900 acre alternative, were not adequately analyzed. There was no justification for each alternative, justification was without logic, and based on irrelevant factors.***

Response: The Draft SGEIS considered a smaller expansion alternative, which alternative would allow for development on only a portion of the Project site, potentially keeping the remainder of the site in its current state, as vacant, undeveloped land or residential homes, and could reduce, or potentially avoid, the potential need to use the EDPL to acquire lands. See Draft SGEIS, Section 2.4. This alternative was fully evaluated. Specifically, it compared the potential impacts to the Project and also discussed limitations of the alternative. Ultimately, it concluded that the "smaller expansion alternative does not maximize the development potential of the Park and does not expand options for avoiding and mitigating potential adverse environmental impacts" and is therefore "not an acceptable option." See also Response to Alternatives Comment 1.

- 4. There are smaller alternatives that don't involve eminent domain that can be done. OCIDA can exercise the smaller alternatives, it simply doesn't want to.***

Response: See Response to Alternatives Comments 1 & 3. OCIDA did consider a smaller development alternative in both the 2013 FGEIS and in the Draft SGEIS. In both instances, it was determined that the smaller expansion alternative does not maximize the development potential of the Park and does not expand options for avoiding and mitigating potential adverse environmental impacts. See Draft SGEIS, Section 2.4.



- 5. *It is inappropriate in an environmental impact statement to weigh economic impacts, particularly in the alternatives sections 2.1, 2.2. The definition of 'environment' in 6 NYCRR § 617.2 does not include economic impact.***

Response: Alternatives sections 2.1 and 2.2 do not purport to weigh the economic benefit of the Project but merely notes the economic impact of certain alternatives vis-à-vis the Project. As detailed in the SEQR Handbook (p. 147):

It is not the intention of SEQR for environmental factors to be the sole consideration in agency decision-making. The purpose of SEQR is to ensure that the environmental impacts of an action are weighed and balanced with social, economic, and other considerations so that a suitable balance of social, economic, and environmental factors may be incorporated in the planning and decision-making processes of state, regional, and local agencies.

In accordance with SEQRA, after this Final SGEIS is completed, OCIDA will weigh both economic impacts as well as any adverse environmental impacts that have not been avoided, minimized or mitigated.

- 6. *The alternative of building the utility substation at another location was not analyzed.***

Response: The National Grid electrical substation already exists, which is one of the reasons why the Park is an ideal location for the semi-conductor industry. Building an alternative substation is not an appropriate alternative based on the purpose and need of this Project.

To the extent that the commenter meant to imply that other locations were suitable for future development because OCIDA could explore building another substation elsewhere, such an alternative is outside of OCIDA's jurisdiction or control. OCIDA does not build, own, or maintain power substations. Moreover, OCIDA would note that a key factor in locating a substation is location in proximity to existing transmission lines and, here the existing National Grid substation is in close proximity to the NYPA and National Grid transmission lines.

- 7. *The OCIDA's current level of investment should not be used as a reason for preference of a certain alternative.***

Response: The alternatives analysis and selection of the preferred alternative is based on the comparison of potential environmental impacts and existence of any limitations as enumerated in Section 2 of the Draft SGEIS. OCIDA's current level of investment was not used as a criterion for comparing alternatives to identify a preferred alternative for this Project.

- 8. *The fact that technical studies are becoming outdated should not be a basis for preference of one alternative over another (p. ES4).***

Response: Comment noted. The No Action Alternative was fully evaluated in the Draft SGEIS Section 2.2 wherein it was determined not to be preferred. As detailed therein, the no action alternative would adversely affect Onondaga County's ability to remain competitive in attracting large-scale industries to Central New York and would preclude potentially beneficial economic impacts associated with the Project, including an increase in employment opportunities and enhanced tax revenues. Also, as



previously disclosed in the 2013 FGEIS (Draft Section 2.1), current investment in the site may be lost with the no action alternative, as site conditions change over time. The no action alternative would also preclude a comprehensive plan of development that includes measures to avoid and minimize impacts to ecological resources versus potential piecemeal, and uncoordinated separate developments that would not consider the larger area that the Park encompasses. OCIDA also is not relying on the age of any technical studies as a criterion for comparing alternatives to identify a preferred alternative for this Project.

***9. Brownfield alternatives were not suggested in the EIS. Brownfield alternatives should be analyzed.***

Response: See Response to Alternatives Comment 1. There are no brownfield sites within Onondaga County that would be appropriate for this Project. The current brownfields within Onondaga County do not offer the needed acreage, utility capacities, or transportation connectivity to adequately accommodate the proposed development.

***10. A comprehensive plan for the area would be ideal, with development, forever wild, and educational/nature park alternatives to be equally considered.***

Response: Comment noted. The whole purpose of the Project is to facilitate a comprehensive plan of development that includes measures to avoid and minimize impacts to ecological resources versus potential piecemeal, and uncoordinated separate developments that would not consider the larger area that the Park encompasses and also incorporate greenspace and other preservation areas as appropriate and feasible.

***11. The wetlands will remain undisturbed/undeveloped regardless of the size of the development. A smaller sized park will not necessarily cause greater wetlands disturbance. Decreasing the size of the park will not circumvent the need for NYSDEC and U. S. Army Corps of Engineers wetlands regulations.***

Response: See Response to Alternative Comment 4, Community Character Comment 1. A smaller sized Park could result in greater wetland disturbance as the developable area would be smaller. As a result, the acreage needed for development could encroach on resources, such as wetlands, which would otherwise be avoided through a larger sized park footprint. The need for NYSDEC and USACE permits would be determined once a conceptual plan for a specific development is available, regardless of the size of the Park.

***12. The greenspace and buffering from environmental receptors are also a function of NYSDEC/USACE regulations as well as local planning and zoning ordinances (2.3.3).***

Response: Comment noted.

***13. Alternatives to acquiring the property through eminent domain have never been discussed.***

Response: In the first instance, eminent domain is not a foregone conclusion. See Response to Eminent Domain Comment 1. Irrespective, the Draft SGEIS does consider alternatives that would not require



eminent domain, including the No-Action Alternative (Section 2.2), the Park as Considered in the 2013 FGEIS (Section 2.3), a smaller expansion (Section 2.4) and development at another location (Section 2.5).

***14. The alternative of transmitting the power from the substation to downstate should be explored.***

Response: See Response to Alternatives Comment 6.

***15. A comment was made that a thorough review of all the alternatives has been done.***

Response: Comment noted.

## **Ecological Resources**

***1. There were general statements that the Park would cause contamination of ecological resources, and that the environmental impacts were not considered adequately.***

Response: Comment noted. Potential environmental impacts, including to air, water and land resources were evaluated in the Draft SGEIS. Impacts on water resources are evaluated in section 4.6, air resources in section 4.7, and ecological resources in section 4.8.

***2. There were general statements that the increase in cars and trucks as a result of the development would cause contamination of land.***

Response: See Response to Ecological Resources Comment 1; Response to Air Resources Comment 2; Response to Water Resources Comment 2.

***3. Comments were made that the pollution generated from advanced manufacturing facilities that would eventually be located at the Park would impact watersheds, rivers, and other water bodies, including the Oneida Lake Watershed.***

Response: See Response to Ecological Resources Comment 1, Response to Water Resources Comment 1. The impact analysis and potential mitigation measures detailed in the Draft SGEIS, specifically Section 4.6, include measures to prevent adverse impacts on local water resources, including the Oneida Lake Watershed.

Potential air and solid waste impacts are also addressed. See Draft SGEIS, Sections 4.7, 10.0. While a modern industrial park may create air emissions as well as solid and hazardous waste associated with vehicles and/or manufacturing processes, environmental laws and regulations at the federal, state, and local level are in place to minimize these risks during Park construction and operation.

All future industrial development will be subject to applicable air emission permitting under NYSDEC. Facilities locating within the Park will also have to meet air emission permit requirements designed to meet the National Ambient Air Quality Standards (“NAAQS”) and comply with all applicable regulatory requirements. See Draft SGEIS, Section 4.7. For purposes of minimizing Greenhouse Gas (“GHG”) emissions, future tenants will be encouraged to promote green infrastructure and energy efficiency (Section 9.0) and, to the extent feasible, use renewable forms of energy to power operations.



Solid waste management will be consistent with goals established by the Onondaga County Resource Recovery Agency (“OCRRA”). See Draft SGEIS, Section 10.1. It is anticipated that a Project site developer will institute measures to reduce solid waste generation, reuse materials (where possible), and institute recycling measures. These “best-management” practices are cost-effective alternatives to offsite disposal. Future development and operations within the Park will also be required to comply with Chapter 194 of the Town’s Solid Waste Code.

Additionally, hazardous waste that is generated, treated, and stored by the Park will be controlled by permits and regulations administered by NYSDEC and U.S. Environmental Protection Agency (“USEPA”), under the Resource Conservation and Recovery Act (“RCRA”). See Draft SGEIS, Section 10.2. Off-site disposal of hazardous waste would be coordinated with a licensed hazardous waste hauler and one or more permitted treatment/disposal facilities.

- 4. General concerns were expressed regarding the adequacy of the identification of wetlands and the assessment of impacts to the wetlands. Mitigation cannot be determined because the developer is unknown. Wetlands have not been field verified.***

Response: See Response to Purpose and Need Comment 15. Wetlands were identified using published maps widely used and relied upon by state and federal agencies, including NYSDEC. Additional information from prior wetlands delineations were included in the 2013 FGEIS. Due to the expectation that development will occur within the Prime Developable Area, impacts to wetlands are not anticipated. Once there is a specific development proposal, field reconnaissance, and if necessary, delineation, based on a conceptual plan for a specific development, will confirm the regulated status of wetland areas potentially impacted, if any and mitigation will be addressed as need be.

- 5. There are sensitive receptors in the community, such as children, nursing homes, churches, and parks, that will be impacted by the air pollution and water pollution that have not been mentioned.***

Response: Potentially sensitive receptors within 2,500 feet of the project were identified. See Draft SGEIS, Section 4.12. See also Response to Air Resources Comments 1 & 2, Response to Water Resources Comments 1 & 2.

- 6. General comments were expressed that the environmental impacts of road improvements, including widening, were not adequately addressed.***

Response: The roadway improvements area of potential effects are considered, and their impacts are addressed for each individual resource area within their respective sections in the Draft SGEIS, 3.0 Environmental Setting and 4.0 Potential Environmental Impacts and Mitigation. This approach adequately satisfies SEQRA. A specific example of where the proposed roadway improvements’ potential environmental impacts were considered and described is within Section 3.6.2 Surface Water under Proposed Utility Line Routes and Roadway Improvements.



**7. *Semiconductor plants are sensitive to seismic shocks. Very large buildings built in wetlands or muddy terrain will shift or sink. An example is Cicero High School.***

Response: The expectation is that development will occur within the Prime Developable Area, accordingly OCIDA does not anticipate large buildings will be constructed in a wetland. Further, the expanded Park is in a seismically stable zone. The United States Geological Survey (“USGS”) produced a 2014 Seismic Hazard Map for New York State showing the site within a zone that has a 2% probability of exceeding a spectral acceleration (*i.e.*, ground movement) of 8-10% gravity. This seismic risk zone is the second lowest of six zones in the State. There is an existing geotechnical report for the site that included an evaluation of soil types. It is fully expected that any future developer will consider the soil types and seismic risk probability during their foundation design. *See* Draft SGEIS, Section 3.5.

**8. *The water bodies referenced in the EIS- Young’s Creek, Oneida River Basin, Oneida River basin tributaries- are not classified correctly.***

Response: The water bodies referenced in the Draft SGEIS were identified using both the New York Stream Classification Map (*see* Draft SGEIS, Fig. 3.6) and the NYSDEC Environmental Resource Mapper, which correlate with 6 CRR-NY X B 14 899. In the northern portion of the Site, Youngs Creek was identified as a tributary to Oneida River and has a classification of C (6 CRR-NY 899-10). The other classified streams on site were identified as tributaries to Oneida River as well and are also class C waters (6 CRR-NY 899-10).

**9. *Groundwater displacement from construction was not addressed.***

Response: Groundwater impacts from construction were addressed. *See* Draft SGEIS, Section 4.6.1. As discussed, shallow groundwater conditions will be considered during the site design/construction and may require engineering controls or mitigation. This was also indicated in the 2013 FGEIS. Potable water at the Park will be derived from an existing OCWA waterline and groundwater will not be needed. Therefore, future site operations are not anticipated to impact long-term groundwater quantity. Furthermore, it is anticipated that standard best engineering practices will be employed by any future tenant(s) to minimize any changes to existing topography and vegetative cover, which will minimize any related impacts to drainage and water quality.

**10. *Concerns were raised that environmental impacts to neighborhoods outside of the Burnet Road residents were not considered.***

Response: Impacts to sensitive receptors/resources and the surrounding neighborhoods, including residences located near the Park were evaluated for each resource area as required by SEQRA. Additionally, in conjunction with either a zone change or PDD approval process, OCIDA and/or a future tenant will work with the Town Board and/or Planning Board to identify specific issues or areas of concern and develop specific measures to address or alleviate such concerns to ensure the objectives of the Project are achieved while also minimizing or mitigating development related impacts on the surrounding community. *See* Draft SGEIS, Section 4.2.





***11. The EIS states that 626 acres are prime agricultural land. Prime agricultural land should not be used for industrial purposes.***

Response: Comment noted. No designated Agricultural Districts exist on the project site and the closest Agricultural District is approximately one-mile northwest (Onondaga County Agricultural Districts, 20192). Although the property currently has only limited agricultural use, future development as a business park/manufacturing site will reduce the availability of suitable agricultural soils.

***12. Costs associated with cleanup and land recovery have not been built into the analysis. Greenfields should be valued higher than the cost to revert it to its natural state.***

Response: Comment noted. See Response to Purpose and Need Comment 8.

***13. The EIS does not identify where the existing habitat tracts are located and whether they are restricted to wetlands or whether they are in other locations within the park (2.3.2).***

Response: See Response to Purpose and Need Comment 15. It is impracticable to predict the locations of the habitat tracts that will be maintained or retained until a conceptual plan for a specific development is available. Once a conceptual plan is developed, as need be, the habitat tracts will be identified and will include both wetland and non-wetland areas of the Park.

***14. The wetlands will remain undisturbed/undeveloped regardless of the size of the development. A smaller sized park will not necessarily cause greater wetlands disturbance. Decreasing the size of the park will not circumvent the need for NYSDEC and U. S. Army Corps of Engineers wetlands regulations.***

Response: See Response to Alternatives Comment 11. If a specific development proposal is made that will impact wetlands on the Project site, the project sponsor will be required to comply with applicable state and federal laws and regulations pertaining to wetlands.

***15. Section 3.8.1 states that actual boundaries of the NWI wetlands may differ from the time the imagery maps were created and provides reasons for the discrepancies, however, the reasons do not adequately discuss ecological succession and its importance, and does not address impacts to those areas.***

Response: See Response to Purpose and Need Comment 15. The Draft SGEIS included a wetlands evaluation for the expanded Park area of the Project site that consisted of an review of state and federal agency resource information maps, soils descriptions, aerial photos, and a delineation report prepared by Terrestrial Environmental Specialists, Inc. ("TES") in 2013. This provided an understanding of the potential nature and extent of wetlands on the Project site. At the time that there is a specific development proposal for the Park, field reconnaissance, including a wetland delineation and soil samples may be necessary to determine the presence of any wetlands, their precise wetland boundaries, and whether there is any connection to a jurisdictional waterway. See Draft SGEIS, Sections 3.8.1 and 4.8.1. Ecological succession is inferred.



***16. General statements were made that there are threatened and endangered species, or habitat or those species present on the site. Mitigation of those impacts are not discussed.***

Response: Mitigation of impacts on threatened and endangered species and/or habitat is discussed in Section 4.8.4 of the Draft SGEIS. Section 4.8.4 identifies specific measures for those species that were previously identified as being in the vicinity of the Park, as well as those species which have potential habitat within the Park or in its vicinity.

***17. There is no concrete plan, therefore the mitigation described addressing the environmental impacts of a project this size on the air, water, wildlife and ecosystem is inadequate.***

Response: See Response to Purpose and Need Comment 15.

***18. Since there is no concrete plan, there is no identification of responsibilities when irreversible environmental impacts take place.***

Response: Comment noted. See also Response to Purpose and Need Comment 15.

***19. Surveys of rare, threatened and endangered plants and wildlife should be required prior to development.***

Response: There are no critical environmental areas or significant natural communities within or in the vicinity of the project area. Based on the available resources reviewed, there are no threatened and endangered animal species identified by the NYSDEC New York Natural Heritage Program (“NYNHP”) and U.S. Fish and Wildlife Service (“USFWS”) known to inhabit or frequent the Project site. See Draft SGEIS, Section 4.8.4.

Future site development activities, including utility line construction and roadway improvements, will be monitored for any occurrence of the identified potential threatened, endangered, or species of special concern, including the Sedge wren, Eastern massasauga, Indiana bat, Osprey, and Sharp-shinned hawk to ensure that construction activities will avoid any direct harm to these listed species. Additionally, the following USFWS recommendations, which restrict and/or prohibit incompatible construction practices will be followed, if any potential habitat/species is recognized through site reconnaissance. Additional coordination with NYSDEC will also be made prior to the commencement of development activities for concurrence and further guidance, as wildlife/habitat survey(s) may be required (i.e., a grassland breeding bird survey). See Draft SGEIS, Section 4.8.4.

***20. There is no post-development monitoring efforts identified to ensure wetlands and floodplains are not impacted and that mitigation is not required. Post-development monitoring should be made public.***

Response: Due to the expectation that future development will occur in the Prime Developable Area, impacts to wetlands are not anticipated. To the extent that a specific development proposal is made, post-development monitoring will be considered and required if need be, in consultation with the NYSDEC and project-related permitting. See also Response to Community Character Comment 1, Ecological Resources Comment 4.



There are no FEMA mapped floodplains within the Park. *See also* Response to Stormwater/Drainage/Flooding Comment 5.

### **Stormwater/Drainage/Flooding**

***1. Stormwater impacts were not adequately addressed. Stormwater volume and pollutant loads are not identified.***

Response: It is anticipated that coverage under State Pollutant Discharge Elimination System (“SPDES”) General Permit for Stormwater Discharges from Construction Activity, GP-0-20-001 (“SPDES Construction GP”) would be required. The Stormwater Pollution Prevention Plan (“SWPPP”) would identify best practices and standards for erosion and sediment control incorporating engineering standards developed by the NYSDEC (2016). These practices may include engineering controls, such as silt fences, hay bales, geofabric installation, stormwater retention, stabilized construction entrances, check dams, and infiltration basins. A stormwater modeling and analysis component of the SWPPP would also be required to reflect pre- and post-construction conditions and would include volume calculations. *See* Draft SGEIS, Section 4.6.3.

*See also* Response to Purpose and Need Comment 15.

***2. The entire site should be included in the MS4. It is currently not included.***

Response: The entire site is not included in a designated Municipal Separate Storm Sewer Systems (MS4). *See* Draft SGEIS, Section 3.6.3. Although the Town of Clay and the Town of Cicero are both designated MS4s, the Site is not located within either of the designated MS4 boundaries. *See* NYSDEC Stormwater Interactive Map (<https://gisservices.dec.ny.gov/gis/stormwater/>; accessed June 15, 2021). The MS4 boundaries are immediately south and east of the site.

As part of the SPDES Construction GP and SWPPP, which is an anticipated requirement of future development at the Park, a MS4 SWPPP Acceptance Form from the Town of Clay and/or Town of Cicero may be required, depending on the off-site locations of the stormwater discharges.

***3. The impacts to neighborhoods from the many acres of paved surfaces was not addressed.***

Response: Stormwater impacts, and potential mitigation measures were addressed. *See* Draft SGEIS, Section 4.6.3. Onsite impervious surfaces will be addressed through an anticipated SPDES Construction General Permit and associated SWPPP. All stormwater will be appropriately managed to ensure any off-site discharge is properly managed and does not negatively impact neighboring properties.

***4. Stormwater impacts to the receiving waters of Young’s Creek, Oneida River, Oneida Lake and Lake Ontario are not addressed.***

Response: *See* Response to Stormwater/Drainage/Floodplain Comment 1. Any potential impacts to the receiving waters would be addressed in the SWPPP. *See* Draft SGEIS, Section 4.6.3.



***5. Floodplains must be delineated.***

Response: As detailed in Section 3.6 of the Draft SGEIS, there are no FEMA mapped floodplains or Special Flood Hazard Areas within the Park. The Park lies entirely within FEMA flood zone X, which is an area of minimal flood hazard. A copy of the Federal Emergency Management Area (“FEMA”) Floodplain Changes in Onondaga County (2016) Map from the Syracuse-Onondaga County Planning Agency was reviewed and is included as Appendix A of the Draft SGEIS. The map depicts the floodplain boundaries referenced throughout the document.

**Solid and Hazardous Waste**

***1. Concerns were raised on how water waste and solid waste will be handled and where it will be disposed. Will it stay in the County or be shipped elsewhere?***

Response: It is anticipated that wastewater would be handled by the Oak Orchard Waste Water Treatment Plant (“WWTP”). Future operations would most likely include one or more wastewater treatment facilities on site at the Park that would provide pretreatment of wastewater prior to discharge into local sewers. *See* Draft SGEIS, Section 4.4.1.

Additionally, management and disposal of solid waste will be consistent with the goals established by OCRRA in its September 2016 Solid Waste Management Plan Update. *See* Draft SGEIS, Section 10.0. It is anticipated that the Town of Clay will incorporate solid waste management requirements (including reuse and recycling measures) into any zoning and land use approvals issued to a future tenant. These “best-management” practices are cost effective alternatives to offsite disposal. It is anticipated that local haulers will provide adequate services to the Park, as is currently being provided to other businesses and industrial users in the County. At this time, it is unknown as to where the future hauler would transport the waste material, as a hauler has not yet been selected.

***2. Concerns were expressed about the potential hazardous materials that are used to manufacture the chips in a semiconductor facility. Do those materials include: hydrochloric acid, metals (arsenic, cadmium, lead), volatile solvents (methyl chloroform, toluene, benzene, acetone, trichloroethylene), toxic gases (arsine)?***

Response: *See* Response to Purpose and Need Comment 15, Solid and Hazardous Waste Comment 1.

Various types of hazardous materials may be produced a result of the potential manufacturing activities that could take place at the proposed expanded Park. Hazardous waste could be in solid, liquid or gaseous forms and is considered hazardous because of its physical characteristics or the process that generated the waste. Potential waste streams may include solvent wastes, isopropyl alcohol, acids, hydrogen fluoride, ethylene glycol, chlorine, wastewater sludge, metal slurries, and metal plating wastes.

Generation of waste products has the potential to create a small to moderate impact if not handled properly and in accordance with State and Federal regulations. However, any such impacts will be mitigated through the use of engineering controls, staff training, best-management practices, and regulatory compliance with State/Federal permits, laws and regulations will be instituted. Hazardous waste that is generated, treated, and stored is controlled by permits and regulations administered by NYSDEC and USEPA, under the RCRA. Off-site disposal of hazardous waste would be coordinated with a licensed hazardous waste hauler



and one or more permitted treatment/disposal facilities. Permitted facilities in New York State that accept hazardous waste include Chemical Waste Management - Model City (Niagara County) and Durez Corporation (Niagara County). Alternatively, hazardous waste may be transported out-of-state using private vendors.

***3. There were general comments and concerns regarding the negative impacts of solid and/or hazarded waste that is generated from the Park. Who will have responsibility for clean ups?***

Response: *See* Response to Ecological Resources Comment 3. With respect to potential spills, federal and state law require the spiller, or responsible party, to notify government agencies and to contain, clean up, and dispose of any spilled/contaminated material in order to correct any environmental damage. NYSDEC can provide additional resources to local agencies during emergencies and will remain involved if continued cleanup of the environment is required. Continued cleanup is the responsibility of the spiller and is required if contamination and environmental damage remain after the initial containment and recovery.

## **Water Resources**

***1. There were general statements that the Park would cause contamination of water and that the environmental impacts were not considered adequately.***

Response: Comment noted. Potential environmental impacts to water resources were evaluated in the Draft SGEIS in Section 4.6.

The location and extent of any temporary or permanent measures to address or control surface water will be determined at the engineering design phase of tenant development. Implementation of these measures may require authorization under a United States Army Corp of Engineers (USACE) Nationwide Permit, which would likely be determined during and/or after the engineering design phase. Any other local, state, and/or federal regulatory requirements would also be determined at that time.

Maintaining vegetated buffer areas and re-vegetating disturbed areas as soon as practicable along the periphery of the Park and internally alongside wetlands and other surface features will help control stormwater runoff and fugitive dust from moving off-site. *See* Draft SGEIS, Section 4.7.

In compliance with State water quality and stormwater management regulations, future development will require a complete detailed Erosion and Sediment Control and Stormwater Pollution Prevention Plan prior to any construction. *See* Draft SGEIS, Section 6.1.

***2. There were general statements that the increase in cars and trucks as a result of the development would cause contamination of water.***

Response: *See* Response to Comment Ecological Resources 1. Impacts resulting from vehicles were assessed on water resources in the Draft SGEIS. Prior to any construction activities, a SWPPP and SPDES Construction Permit with provisions to address potential concerns associated with accidental spills or leaks from construction equipment will be prepared. Included will be controls for vehicle refueling, maintenance, equipment inspections, spill response, and storage of petroleum products. *See* Draft SGEIS, Section 4.6.



**3. *The acreage of planned or estimated impervious surfaces needs to be stated (4.6.2).***

Response: See Response to Purpose and Need Comment 15. The estimated impervious surface acreage at the Park cannot be determined, as a conceptual plan for a specific development does not currently exist. The acreage of planned impervious surface will be analyzed once a development has been proposed and a conceptual site plan is made available.

**4. *The statement in Section 4.6.2, “because surface water drainage is primarily influenced by slope and soil properties, and these two factors will be largely unchanged from the original conditions following site development, no significant impacts to surface water are expected” is misleading. Surficial permeability (soil/ground cover, pavement, or other improvements such as roofs and landscaped/hardscaped areas) is the predominant factor. Slope determines velocity with determines flow (Volume/Time).***

Response: New York State stormwater design standards require the post development rate of runoff (volume/time) to be less than or equal to the pre-development runoff rate at each discrete discharge point. The development plans will have to meet the New York State standards to obtain permits and to be consistent with the Draft SGEIS with respect to potential environmental impacts. Some amount of natural ground cover will be replaced by impervious surfaces (e.g. roads, parking lots and building roofs). Stormwater detention features (ponds) are used to offset the increase in the rate of runoff from impervious surfaces. Any development that falls into a defined industrial category will also be required to obtain coverage under the New York State multi-sector general permit or obtain a site specific SPDES discharge permit. These permits place limits on specific contaminants in runoff discharges to surface waters.

The location and extent of any temporary or permanent measures to address or control surface water will be determined at the engineering design phase of tenant development. Implementation of these measures may require authorization under a United States Army Corp of Engineers (USACE) Nationwide Permit, which would likely be determined during and/or after the engineering design phase. Any other local, state, and/or federal regulatory requirements would also be determined at that time. See Draft SGEIS, Section 4.6.

Maintaining vegetated buffer areas and re-vegetating disturbed areas as soon as practicable along the periphery of the Park and internally alongside wetlands and other surface features will help control stormwater runoff and fugitive dust from moving off-site. See Draft SGEIS, Section 4.7.

In compliance with State water quality and stormwater management regulations, future development will require a complete detailed Erosion and Sediment Control and Stormwater Pollution Prevention Plan prior to any construction. See Draft SGEIS, Section 6.1.

**5. *General concerns were raised about the adequacy of the assessment of water resources at the site, including the wetland inventory, classification of streams.***

Response: The Draft SGEIS in conjunction with the 2013 FGEIS adequately evaluates impacts on water resources for the Park. See Draft SGEIS, Sections 3.6 and 4.6. See also Response to Water Resources Comment 1, Ecological Resources, Comments 4 & 15.





***6. The EIS does not address a plan to prevent pollution, including from leaking underground storage tanks, from impacting water resources.***

Response: Section 4.6 of the Draft SGEIS addresses pollution prevention. As discussed in that section, it is anticipated that there will be a SWPPP and SPDES Construction Permit to address potential concerns associated with accidental spills or leaks from construction equipment. Included will be controls for vehicle refueling, maintenance, equipment inspections, spill response, as well as storage of petroleum products. A Spill Prevention Control and Countermeasures (“SPCC”) Plan and/or a NYSDEC Petroleum Bulk Storage (“PBS”) Registration may also be required if site development and/or operations are deemed regulated. The SPCC Plan would address the potential for minor accidental spills or leaks from construction equipment as well as any on-site PBS tanks or containers. The plan would also include provisions for inspections, secondary containment, equipment refueling practices, and spill response.

***7. The EIS does not address the potential new use or the additional use of groundwater, and the potential for the project to introduce contaminants to the groundwater.***

Response: It is not expected that on site groundwater will be used as a water source, since an on-site OCWA water main can serve the Park. *See* Draft SGEIS, Section 4.6.1. However, potential development at the expanded Park could create up to 4,000 jobs, which could increase demand for housing, and require new residential construction spread throughout the Syracuse Metropolitan Statistical Area for future employees. Additional drinking water supplies, some of which may be from groundwater sources, are likely. This could present a relatively small, localized impact on groundwater availability, which was evaluated. *See* Draft SGEIS, Section 4.6.1. *See also* Response to Water Resources, Comment 1.

***8. The EIS does not quantify the increase in pollution to soil and water. This must be made public prior to project approval.***

Response: *See* Response to Purpose and Need Comment 15. Once there is a specific development proposal for the Park, the existence and exact quantification of potential impacts will be quantified and made public in accordance with local and state permitting requirements.

## **Air Resources and Climate**

***1. General statements were made regarding impacts to air and air contamination from the manufacturing, including air impacts from construction.***

Response: Comment noted. The potential impacts to air resources from construction and operation of future development are addressed in Section 4.7 of the Draft SGEIS.

***2. There were general statements that the increase in cars and trucks as a result of the development would cause contamination of air.***

Response: *See* Response to Air Resources Comment 1. Potential impacts from vehicles on air resources were evaluated in the Draft SGEIS. While increases in traffic volumes are anticipated from the Park development, the mitigation (road and intersection improvements) proposed in the Draft SGEIS will allow traffic flow to be maintained with minimal change in corridor travel time speeds or delays (queuing of vehicles) at signalized intersections within the studied transportation network. The mitigation proposed for



the Project site will allow for vehicular flow at lower emission levels compared to a congested transportation network that has not had the proposed transportation mitigation implemented. *See* Draft SGEIS, Section 4.7.

**3. *There is no business or tenant. It is impossible to issue an air permit without a business or tenant. The project however, may require a permit.***

Response: The commenter is correct that an air permit may be required for future development of the Park. As noted in the 2013 FGEIS and section 4.7 of the Draft SGEIS, all future industrial development will be subject to applicable air emission permitting under the regulatory oversight of the NYSDEC. As this is a generic EIS, the commenter is correct that there is no current business or tenant for the Park. Once there is a specific development proposal for the Park, OCIDA will require that the proposed developer secure a NYSDEC air permit, as necessary in accordance with applicable statutes and regulations. The purpose of NYSDEC's air permit program is to "maintain a reasonable degree of purity of the air resources of the state, which shall be consistent with the public health and welfare and the public enjoyment thereof, the industrial development of the state, the propagation and protection of flora and fauna, and the protection of physical property and other resources, and to that end to require the use of all available practical and reasonable methods to prevent and control air pollution." It is anticipated that as part of any required air permitting that NYSDEC will impose, as appropriate, permit conditions to implement emission control equipment and other operating parameter and conditions, which any prospective tenant will be required to abide by to meet the program objectives.

**4. *How much greenhouse gas ("GHG") will be directly and/or indirectly produced due to this development?***

Response: *See* Response to Purpose and Need Comment 15. Based on the representative GHG emission estimates for a generic semiconductor manufacturing operation, GHG emissions from the expanded Park were detailed in the Draft SGEIS. As detailed in Section 4.7.2, GHG emissions from future development could include the following:

- Direct GHG emissions associated with natural gas and fuel oil combustion in boilers, thermal incinerators and other miscellaneous natural gas-fired sources
- Carbon dioxide emissions from the oxidation of volatile organic compounds (VOCs) from the expected use of liquid chemicals
- Specialty gases used in the manufacturing process, including fluorinated and chlorinated GHGs.
- Indirect (upstream) GHG emissions from the import of natural gas and fuel oil

Potential direct annual GHG emissions at the expanded Park could range from 150,000 metric tons carbon dioxide equivalent (MTCO<sub>2</sub>e) to 350,000 MTCO<sub>2</sub>e. Approximately 10-15% of these GHG emissions are expected to result from the use of specialty gases including nitrogen trifluoride and sulfur hexafluoride, which have 20-year global warming potentials (GWP) of 12,800 and 16,300, respectively. Indirect (upstream) potential annual GHG emissions from the import of fossil fuels could range from 150,000 MTCO<sub>2</sub>e to 250,000 MTCO<sub>2</sub>e.

In general, OCIDA will take a proactive approach to addressing sustainability, climate change and GHG



Reduction and seek to reduce GHG emissions. This approach may include the following:

- Working with future developers to develop process improvements, including those that reduce GHG emissions by eliminating the use of the GHGs with higher Global Warming Potential (GWPs)
- Promoting goals to improve energy efficiency and reduce electricity consumption
- Implementing co-pollutant reduction measures (air emission controls)
- Promoting the use of a vehicle fleet that includes hybrid and electric vehicles.

**5. *A comment expressed concerns that ammonia may be used in chip manufacturing, and if so, how it impacts air emissions, and how those impacts will be mitigated?***

Response: Comment noted. The potential for ammonia and mitigation options is discussed in the Draft SGEIS at Section 4.7.3. It is anticipated that ammonia will be addressed as part of any NYSDEC-issued air permit for future development.

**6. *The climate in New York is not suited to advanced manufacturing, other states are more suitable which is why they are choosing to locate elsewhere.***

Response: Comment noted. New York State has been and continues to be at the forefront of advanced manufacturing. The State has a long history of advanced manufacturing companies. Advanced manufacturing companies continue to locate, operate and expand in the State due to its workforce and utility infrastructure. Indeed, high tech industries have recently chosen to develop manufacturing capacity in upstate New York including Cree in Marcy, NY and GlobalFoundries in Malta, NY. GlobalFoundries has invested \$15 billion in upstate New York development in the last decade and recently announced they are relocating their headquarters from California to Malta.

**7. *There were general comments that the project is not in conformance with the latest trends to “go green”, including NY State and Federal regulatory mandates and climate change policies.***

Response: Climate change, specifically the Climate Leadership and Community Protection Act (“CLCPA”), is addressed in the Draft SGEIS at Section 3.7.2 and 4.7.2. All future industrial development will be subject to applicable air emission permitting under NYSDEC. Such an application will be required to be submitted to NYSDEC who will, in turn, review the application in accordance with all applicable state and federal laws, and impose appropriate permit conditions. NYSDEC will also undertake a review of the potential development’s GHG emissions under the CLCPA.

With respect to “green” building design, there are no New York State or Federal initiatives that mandate the application of green building practices or technologies. Rather, there are minimum energy efficiency standards set for design. Section 9 of the Draft SGEIS specifically identifies and references New York State Energy Research and Development Authority (“NYSERDA”), New York State Executive Order 111, Energy Star, OCIDA Promotions and Incentives, and Leadership in Energy and Environmental Design (“USGBC”) as applicable Federal, State, and Local entities with initiatives that promote and reward energy efficiency and “green” building opportunities. It also specifically discusses the benefit of implementation of energy efficient technologies relative to the manufacturing sector as well as industry partnership



challenges and achievements that are targeted for manufacturing. Rewards and recognition are available for manufacturers that achieve their energy reduction and environmental improvement goals.

## **Cultural Resources**

- 1. Concern was raised that numerous NYS Museum and SHPO identified archaeological sites located within one mile of the project site and area of utility improvements.*

Response: Impacts on cultural resources as well as mitigation measures are fully discussed in Section 4.9 of the Draft SGEIS. As disclosed in Section 4.9, State Historic Preservation Office (“SHPO”) is an involved agency and OCIDA will follow their recommendations with regard to any further evaluation of cultural and archeological resources.

## **Eminent Domain**

- 1. There were several comments against the potential use of eminent domain for the purposes of acquiring land for a private purposes.*

Response: Comment noted. Eminent domain will only be used as a last resort and its exercise will be pursuant to the New York Eminent Domain Procedure Law. OCIDA’s preference has always been and remains to come to an agreement with any landowner whose property is needed for the Project whereby the landowner is fully compensated for whatever property is acquired. See Response to Purpose and Need Comment 8.

- 2. There were several comments against the potential use of eminent domain for the purposes of acquiring land without a clear project or proposed developer in mind.*

Response: See Response to Eminent Domain Comment 1.

- 3. Residents of Burnet Road expressed no desire to move from their homes. The threat of eminent domain is generally being abused, including to motivate residents to sell below market value.*

Response: See Response to Eminent Domain Comment 1.

- 4. OCIDA is an independent public benefit corporation that does not have the authority to use eminent domain.*

Response: Comment noted. Industrial Development Agencies in general, and OCIDA in particular, possesses the power of eminent domain pursuant to General Municipal Law (“GML”) §§ 852, 858, and 895. Specifically, GML § 858(4) authorizes industrial development agencies,

...to acquire by purchase, grant, lease, gift, **pursuant to the provisions of the eminent domain procedure law**, or otherwise and to use, real property or rights or easement therein necessary for its corporate purposes... (emphasis added)



Numerous judicial decisions have confirmed industrial development agencies' power of eminent domain. *See, e.g., Kaufmann's Carousel, Inc. v City of Syracuse Indus. Dev Agency*, 301 A.D.2d 292, 299 (4th Dep't. 2002), *lv denied* 99 NY2d 508 (2003); *Matter of Northeast Parent & Child Soc'y v. City of Schenectady Indus. Dev. Agency*, 114 A.D.2d 741,742 (3rd Dep't. 1985). *See also* Response to Purpose and Need Comment 8.

***5. Why is eminent domain necessary since there is enough room to buffer the proposed site from the neighbors?***

Response: The expanded footprint is necessary to accomplish the stated purpose of the Project. *See* Draft SGEIS, Section 1.1.1, 1.1.2, & 1.1.3. There is insufficient room to buffer the anticipated development of the site from the residents of Burnet Road. Even if future development could be achieved without expanding the Park to include the residences on Burnet Road, it would likely result in significant environmental impacts (*e.g.*, visual and noise) to the remaining residents and would reduce the size of open greenspace incorporated into any development design and potentially cause greater wetlands disturbance.

Eminent domain will only be used as a last resort and its exercise will be pursuant to the New York Eminent Domain Procedure Law. OCIDA's preference has always been and remains to come to an agreement with any landowner whose property is needed for the Project whereby the landowner is fully compensated for whatever property is acquired. *See also* Response to Purpose and Need Comment 8.

***6. General questions and comments were made regarding the procedures and regulatory requirements, including timing, under Eminent Domain Procedure Law.***

Response: Eminent domain will only be used as a last resort and its exercise will be pursuant to the New York Eminent Domain Procedure Law. OCIDA's preference has always been and remains to come to an agreement with any landowner whose property is needed for the Project whereby the landowner is fully compensated for whatever property is acquired. *See also* Response to Purpose and Need Comment 8.

***7. A question was raised whether OCIDA is acquiring the Burnet Road residences only for purposes of acquiring Burnett Road as an access road.***

Response: OCIDA is acquiring the residences on Burnet Road in order to expand the Park. Until such time as there is a specific tenant or tenants, the actual development of the Park, including location of access roads, etc., has not been determined.

***8. Greenfields should be valued higher than the cost to revert it to its natural state.***

Response: Any and all property acquired pursuant to the eminent domain process will be valued at its highest and best use at the time of any such taking consistent with the obligation to pay just compensation pursuant to the Eminent Domain Procedure Law and United States and New York Constitutions. *See also* Response to Purpose and Need Comment 8.

***9. Concerns were raised regarding taxpayer obligations to pay legal fees and possible settlements should the residents decide to litigate.***

Response: Comment noted. Any such litigation is governed by the provisions of the Eminent Domain Procedure Law. *See also* Response to Purpose and Need Comment 8.



***10. One commenter expressed their opinion that eminent domain would trigger SEQRA.***

Response: Comment noted. Pursuant to the Eminent Domain Procedure Law and SEQRA, SEQRA will apply if, and when, OCIDA must exercise its eminent domain authority. As such, this SEQRA review of the Park expansion considers the potential environmental impacts of that possible future action by OCIDA.

**Transportation**

***1. General statements were made that the area cannot handle the increased traffic associated with the project.***

Response: The Traffic Impact Study (TIS) describes and analyzes both the existing and future traffic conditions with a buildout of the Park based on potential development assumptions. See Draft SGEIS, Appendix B. The TIS also makes recommendations for traffic operations and safety improvements to mitigate for the Park development within the transportation network. With appropriate mitigation, selected and implemented in consultation with the New York State Department of Transportation (“NYSDOT”), it is anticipated that the area can accommodate the increased traffic anticipated from future development of the Park. See Draft SGEIS, Section 4.3.

***2. Questions and general comments were raised regarding who is going to fund the road improvements.***

Response: See Response to Purpose and Need Comments 8 & 15.

***3. Route 31 is not capable of handling the anticipated traffic. Route 31, 11 and 81 are currently unsafe. Improvements are needed to Route 81 and Route 481.***

Response: The TIS addresses existing traffic conditions as well as future conditions with a buildout of the Park based on potential development assumptions. The TIS makes recommendations for traffic operations and safety improvements to mitigate for the Park development within the transportation network and, where appropriate proposes crash reduction measures, which includes recommendations at high crash locations. OCIDA will work with NYSDOT to adopt final traffic improvement measures to mitigate the potential operational and safety impacts. See Draft SGEIS, Appendix B.

***4. The traffic study is inadequate because the developer is unknown. The traffic study is based only on assumptions and is therefore inadequate.***

Response: See Response to Purpose and Need Comment 15. The TIS was developed using assumptions based on a potential built development scenario for the Park site, and an assessment of specific traffic impacts providing mitigation to satisfy those traffic impacts.

***5. The details of the traffic study are not provided. The commercial corridor on Route 11 is not addressed. It does not address which homes or properties will be taken for road widening. There is no commensurate transportation improvement plan.***

Response: The details are provided in the TIS. See Draft SGEIS, Appendix B. A discussion of the potential for property acquisitions related to transportation improvements is included in the Final SGEIS. See Final SGEIS, Section 5.2.





***6. The traffic study should be presented in terms that the public can understand.***

Response: Comment noted. The TIS (Draft SGEIS Appendix B) was prepared in accordance with NYSDOT requirements. Sections 3.3 and 4.3 of the Draft SGEIS summarize the findings of the Traffic Impact Study in layman's terms to facilitate the public's understanding of potential traffic impacts.

***7. The projected dates for failure of Route 31, Route 11, Interstate 81 ramps and Route 481 interchange are inaccurate. They will fail sooner with the project development.***

Response: The Traffic Impact Study describes and analyzes both the existing and future traffic conditions with a buildout of the Park. The potential development assumptions and scenario used a 'worst case' approach to growing traffic volumes, even in the midst of the pandemic with overall traffic volumes less than in past years' traffic counts. Growth rates were based on historical volume and trends and were agreed to be 0.75% per year.

Following its review, NYSDOT confirmed that the TIS meets its requirements and appropriately documents the study area. See NYSDOT Comment 7.

***8. Concerns were raised regarding prolonged construction vehicle traffic on Caughdenoy Road between Route 481 exit and Route 31. Impacts to the Country Meadow and Coachman's Crossing developments are not addressed.***

Response: Comment noted. This concern was evaluated in the TIS (Draft SGEIS Appendix B) and mitigation proposed. As detailed therein, construction traffic would be scheduled outside peak travel times where feasible and would determine work zone traffic control and/or detour routes around the proposed work zones for site, utility, and transportation improvements.

Impacts of future developments were reviewed and those that have been approved to move forward or are in construction have been shown in the TIS.

***9. Concerns were raised that the traffic study did not fully evaluate the impacts all along Route 31, only the intersections. Widening would impact the households along the entire route, not just the intersections.***

Response: See Response to Transportation Comment 7. The TIS does in fact describe the traffic flow effects along NYS Route 31 between the signalized intersections using Travel Speeds. See Draft SGEIS, Appendix B, Section 5.6 and Table 4. Use of travel speeds is an industry method of determining traffic flow changes. The improvement recommendations described in the TIS do not include widening of NYS Route 31 west of NYS Route 11.

***10. Concerns were raised regarding evaluation of traffic increases in the building of the facility, and then the impacts of the traffic during operation.***

Response: See Response to Transportation Comment 1.



***11. The traffic study was completed in 2012 and is needs to be updated. There has been considerable development since that study was completed.***

Response: The TIS (Draft SGEIS, Appendix B) was provided as part of OCIDA's supplemental environmental review of the Project. Year 2021 existing traffic volumes are provided within the study area as part of the Traffic Impact Study. *See also* Response to Transportation Comment 1 and 8.

***12. Specific improvements were not identified, such as: will Route 31, Caughdenoy Road and Mudmill Road be 5 lanes; what will change at the Route 481 northbound exit; will it consider a Route 481 South on ramp.***

Response: The TIS (Draft SGEIS, Appendix B) discusses the menu of transportation mitigation that combined makes recommendations for traffic operations and safety improvements to mitigate for the Park development within the transportation network. *See also* Response to Transportation Comment 1.

## **Utilities and Community Services**

***1. A concern was raised as to whether the police department is able to provide the additional services needed due to this project.***

Response: Facility security is addressed in Section 4.4.2 of the Draft SGEIS. Future tenants of the Park are expected to provide security and basic emergency preparedness programs for their own facilities. As such, and as further detailed in the 2013 FGEIS and Draft SGEIS, development of the expanded Park is not anticipated to create a burden on the provision of police, fire, and emergency services.

***2. The current infrastructure, including sanitary sewers, and water supply, cannot support the project. The infrastructure also cannot support the sudden population growth associated with the new employees.***

Response: The utility companies serving the area have indicated that they have the necessary capacity to meet the demands of the proposed development. *See* Draft SGEIS, Section 4.4.1. Correspondence provided by the utility companies was included in Appendix C of the Draft SGEIS.

***3. The projected increased enrollment at Cicero North Syracuse School District of 1.6% is conservative. The current buildings are at over-capacity now. The taxpayers of Clay, Cicero and North Syracuse should not have to make up any necessary tax increases to accommodate the enlarged enrollment base. The analysis of the impacts on schools is unrealistic, and does not mention impacts to other schools***

Response: Comment noted. The impact of population growth and school enrollment due to the proposed development is addressed in Sections 4.4 and 7.1 of the Draft SGEIS. The estimated increase in student population the North Syracuse Central School District is approximately 1.6%. This estimate assumed that the increase in the student population would be proportional to the increase in the number of households and that the households are evenly distributed throughout the Syracuse MSA. *See also* Response to Purpose and Need Comment 8.



***4. Concerns were raised regarding who is paying for the new natural gas lines.***

Response: See Response to Purpose and Need Comments 8 & 15. Once there is a specific development proposal and a new natural gas line is authorized to proceed, responsibility for the cost of construction will be determined.

***5. Comments were raised that the impacts on drinking water were not adequately addressed. Will the facility have priority in receiving water supply during a drought or restricted use periods?***

Response: No impacts to drinking water are anticipated. The expanded Park's estimated water demand is within the levels OCWA has indicated it can provide, and would not adversely impact the availability or capacity of the local public water supply in the surrounding area.

Future development will not have priority in receiving water supply.

***6. Who will be responsible for making the determination whether wastewater pre-treatment is required and at what limits? Concerns were raised regarding whether a wastewater treatment plant will be on site.***

Response: Industrial wastewater pre-treatment may be required on-site by the OCWEP prior to discharge to the Oak Orchard WWTP, if the wastewater strength from the expanded Park exceeds the limits established for discharge to the municipal sanitary sewer system. It is expected that future operations will include one or more wastewater treatment facilities that will provide pretreatment of wastewater prior to discharge into local sewers. See Draft SGEIS, Section 4.4.1.

***7. There will be significant impacts to Meltzer Park. Impacts to Meltzer Park are inadequately identified.***

Response: The Visual Impact Assessment located in the Draft SGEIS, Appendix D, includes Meltzer Park as a potential viewpoint. As discussed in the VIA, during leaf-off seasons Meltzer Park will have potential views of the Park. See Draft SGEIS, Appx. D, p. 13. The view is likely to increase with more vertical structures. However, these views are expected to be partial views that are screened to some degree by either topography or vegetation rather than unobstructed views.

***8. What is the quantity of water that will be used daily, and will this effect lake levels. Will the water usage impact residents along the Oneida River or Oneida Lake.***

Response: See Response to Purpose and Need Comment 15, Response to Utilities and Community Services Comment 5. The expanded Park's estimated water demand of 5 MGD is within the levels OCWA has indicated it can provide, and therefore future development of the Park would not adversely impact the availability or capacity of the local public water supply in the surrounding area. No mitigation would be required.

***9. Will the development affect the power lines near or on the site?***

Response: See Response to Purpose and Need Comment 15. It is anticipated that future development will avoid and not impact the power lines that are located on or in the vicinity of the Park.



## **Human Health**

- 1. There are sensitive receptors in the community, such as children, nursing homes, churches that will be impacted by the air pollution, water pollution that have not been mentioned.*

Response: Potentially sensitive receptors within 2,500 feet of the project were identified in Section 4.12 (Human Health) of the Draft SGEIS, which is greater distance than required by the SEQRA process (*i.e.* 1,500 feet). The section addressed the potential impacts of pollution, increased traffic and noise to sensitive receptors in the community and mitigation measures during construction and operation.

- 2. Workers at semiconductor facilities have a higher incidence of health problems, such as cancer and miscarriages. This was not addressed.*

Response: Comment noted. *See* Response to Purpose and Need Comment 8. Nevertheless, OCIDA notes that the Occupational Safety and Health Administration (“OSHA”), which is part of the United States Department of Labor, governs the safe and healthful working conditions for workers in the United States. Under the provisions of the Occupational Safety and Health Act of 1970 (“OSHA”), employers must provide a workplace free from recognized hazards. Employers must comply with all OSHA worker safety standards. Typical preventive measures include safety training, establishment of work procedures, providing personal protective clothing (as necessary), internal audits, medical monitoring of staff, and OSHA reporting of any accidents. It is anticipated that any prospective tenant for the Park will comply with all health and safety laws and regulations, including OSHA’s worker safety standards.

## **Noise**

- 1. Commenters made statements and expressed general concerns regarding noise associated with the project.*

Response: Potential noise impacts were evaluated. *See* Draft SGEIS, Section 4.11.1. To estimate potential noise levels, a noise impact assessment was performed, in accordance with NYSDEC guidance. Based on a potential development and a conceptual footprint over the prime developable area, a noise impact assessment found that:

- Operation of the Park is not anticipated to increase sound levels above current daytime levels at surrounding property lines or sensitive receptors.
- Operation of the Park may increase sound levels above current nighttime levels at surrounding property lines or sensitive receptors by up to 4.4 decibels, which per NYSDEC guidance, is considered “unnoticed to tolerable.”
- Temporary and intermittent construction activities at nearby receptor property lines has the potential to increase sound levels by more than 10 decibels.

Further, future Park tenants will not be permitted to exceed applicable noise thresholds established in Section 152-4 of the Clay Town Code.

Various options to mitigate noise, which can be incorporated into the various phases of site development to reduce potential noise impacts, are detailed in the Draft SGEIS.



## **Visual Impacts**

### ***1. General comments were made regarding impacts to the views of the site.***

Response: The Draft SGEIS included an evaluation of potential visual impacts. *See* Draft SGEIS, Section 4.10. Specifically, it considered the prior Visual Impact Assessment (“VIA”) prepared in 2000 for a previous industrial scenario at the Park by Integrated Site, Landscape Architects, P.C., but its assumptions and conclusions remain valid. It then included an updated VIA due to the expansion of the Park and the issuance of the 2019 New York State Department of Environmental Conservation’s Program Policy DEP-00-2 “Assessing and Mitigating Visual and Aesthetic Impacts.” *See* Draft SGEIS, Section 4.10 & Appendix D. The updated assessment included a review of previously identified sensitive receptors, identification of new receptors as defined by the 2019 NYS Policy, assessment of views from those locations, and identification of mitigation strategies for potentially impacted locations. In total, the updated VIA identified a total of 52 sensitive receptor locations that could potentially be impacted by development of the Park. Of those 52 locations, 34 were identified in the previous assessment and 18 were additional locations identified within a 5-mile radius of the Park.

Based on the VIA, it was concluded that all publicly accessible locations identified based upon the DEP 2019 policy category list would have their view to the Park screened based upon their distance from the site, the relatively flat topography, and the presence of forested areas or patches between the location and the site. Five private or local resources were identified as having partially screened views to the Park and two locations, including the Caughdenoy Road power substation, were determined to have open views to the Park:

Various mitigation options were evaluated, including but not limited to the construction and placement of earthen berms, the use of native plant material, forested buffers, context sensitivity, camouflage/disguise, low profile and consolidation, as well as efficient site lighting and engineering design for site entrances. Mitigation was also considered for lighting impacts.

Once a development is proposed for the Park, it is anticipated that the developer will work with the County and local agencies during the site development process to identify the best strategies to mitigate any potential visual impacts from the proposed development.

### ***2. The visual impact of the development was inadequate. A facility of this size, such as the Amazon warehouse in Clay, will have much more of a visual impact. The building is too large a scale for the area.***

Response: *See* Response to Visual Comment 1. The VIA was prepared utilizing a suggested development footprint that maximized the site conditions both horizontally and vertically. This approach was followed to offer an accurate analysis that identified the most visual impacts until a more refined development footprint could be determined once there is a specific tenant or tenants proposed for the Park. *See* Draft SGEIS, Section 4.10



## **Open Space**

- 1. Section 4.2.2 indicates that development will not result in the loss of public open space. This is a greenfield project. Please define open space.*

Response: The NYSDEC Environmental Assessment Form (“EAF”) Workbook defines open space as “[l]and left in a natural state for conservation, recreation, scenic, or possibly agricultural purposes devoted to the preservation of distinctive ecological, physical, visual, architectural, historic, geologic or botanic sites.” The existing Park and proposed expanded areas do not qualify.

## **Energy**

- 1. The New York State Energy Code was not taken into consideration in the EIS.*

Response: The Draft SGEIS does consider the New York State Energy Code in Section 9.3. There, the New York State Energy Code is referenced as the State Energy Conservation Construction Code (“SECCC”). Currently, the 2020 Energy Conservation Construction Code of New York State is recognized. This code is an integrated and custom code adaptation of the International Energy Conservation Code (“IECC”).

## **Other**

- 1. The EIS does not fully address the impacts of the vibrations from the CSX railway on semiconductor fabrication, which are sensitive to vibrations.*

Response: The comment is beyond the scope of the Draft SGEIS. It is anticipated that any future tenant will consider the potential impacts of vibrations from the CSX railway based on its expected operations and proposed footprint within the Park.

- 2. The EIS does not address the need for development of a rail spur into the facility or whether the anticipated tenants will generate additional rail frequency.*

Response: See Response to Purpose and Need Comment 15. A rail spur is not currently anticipated. Once there is a specific development proposal for the Park, if a tenant proposes a rail spur, it will be separately evaluated under SEQRA.

## **Environmental Assessment Form**

- 1. The Burnet Road area is zoned residential/agricultural. The proper zoning is not in place for this type of project. The project is inconsistent with zoning. The zoning protects the residents and should be respected. Question 17.c. of the EAF should reflect a “moderate to large impact.”*

Response: Comment noted. Because the purpose of the EAF is to assist in making a determination of significance under SEQRA, any perceived mistake in the characterization of a potential adverse impact to zoning is irrelevant. OCIDA issued a Positive Declaration and Notice of Intent to prepare a Supplemental GEIS on December 8, 2021 and in the Draft SGEIS, potential adverse environmental impacts to land use and zoning was fully evaluated. See Draft SGEIS, Sections 3.1, 4.1.





- 2. *Questions 18.1.a. and 18.1.c. of the EAF should reflect a “moderate to large impact may occur” due to the elimination of the entire community of Burnet Road.***

Response: Comment noted. Because the purpose of the EAF is to assist in making a determination of significance under SEQRA, any perceived mistake in the characterization of a potential adverse impact to zoning is irrelevant. OCIDA issued a Positive Declaration and Notice of Intent to prepare a Supplemental GEIS on December 8, 2021 and in the Draft SGEIS, potential adverse environmental impacts to community character was fully evaluated. *See* Draft SGEIS, Sections 3.2, 4.2.

- 3. *General comments were expressed regarding impacts to the wildlife and the adequacy of the analysis with respect to wildlife. The habitat will be permanently altered. Question 7.g. of the EAF should be checked ‘moderate to large impact.’***

Response: As described in the section 4.8.3 of the Draft SGEIS, although vegetative loss would temporarily disrupt the common wildlife species that inhabit the Site, it is anticipated the transient wildlife in these areas would adapt during future site development and following project completion, either by relocating to suitable areas in other areas on site or to surrounding areas. There is no substantial critical habitat loss anticipated as a result of potential development at the Park. Specific impacts and mitigation measures are fully discussed in section 4.8.3 and include maintaining existing habitat tracts. As such, EAF question 7.g is correctly answered for the Park, as it is currently proposed.

Further, because the purpose of the EAF is to assist in making a determination of significance under SEQRA, any perceived mistake in the characterization of a potential adverse impact to zoning is irrelevant. OCIDA issued a Positive Declaration and Notice of Intent to prepare a Supplemental GEIS on December 8, 2021 and in the Draft SGEIS, potential adverse environmental impacts to wildlife was fully evaluated. *See* Draft SGEIS, Sections 3.8, 4.8.

- 4. *EAF Question 7.g., “the proposed action may substantially interfere with nesting/breeding, foraging, or over-wintering habitat for the predominant species that occupy or use the project site” should be checked “moderate to large impact” as the local wildlife will be significantly impacted.***

Response: *See* Response to EAF Comment 3.

- 5. *EAF Question 11.a., “the proposed action may result in an impairment of natural functions or ecosystems services provided by an undeveloped area, including but not limited to stormwater storage, nutrient cycling, wildlife habitat” should be checked “moderate to large impact.” The section appears to be omitted because of the technical classification of open space resources, but this site effectively acts as open space. This should be treated as a valuable, protected resource. Likewise, 11.b., 11.c., and 11.d. should be checked “moderate to large impact” for like reasons.***

Response: *See* Response to Open Space Comment 1. Further, because the purpose of the EAF is to assist in making a determination of significance under SEQRA, any perceived mistake in the characterization of a potential adverse impact to zoning is irrelevant. OCIDA issued a Positive Declaration and Notice of Intent to prepare a Supplemental GEIS on December 8, 2021 and in the Draft SGEIS, potential adverse environmental impacts to ecological resources was fully evaluated. *See* Draft SGEIS, Sections 3.8, 4.8.



6. *EAF Question E.1.c., “is the project site presently used by members of the community for public recreation?” should be checked “yes” as there are many people who use Burnet Road, the paths to the woods and under the power lines for bike riding, ATV use, golf carts, tractors, walking, cross country skiing, ice skating. There is a snowmobile trail running east-west through the northern part of the property (rail C7L, NYSSA). There are bird watchers and nature enthusiasts. Likewise, Question E.2.q. should be checked “yes” as the area is used by hunters.*

Response: Comment noted. See Final SGEIS, Section 5.3.

7. *Questions E2 of the EAF, “does the project site contain, or is it substantially contiguous to, a building, archaeological site, or district which is listed on the National or State Register of Historic Places, or that has been determined by the Commissioner of the NYS Office of Parks, Recreation and Historic Preservation to be eligible for listing on the State Register of Historic Places?” is wrongly checked “no.” The EIS references previously-identified above-ground historic resources located within the expanded park area, with one being eligible for listing on the NRHP. Also, there several historic homes from the 1800’s which should not be demolished.*

Response: Because the purpose of the EAF is to assist in making a determination of significance under SEQRA, any perceived mistake in the characterization of a potential adverse impact to zoning is irrelevant. OCIDA issued a Positive Declaration and Notice of Intent to prepare a Supplemental GEIS on December 8, 2021 and in the Draft SGEIS, potential adverse environmental impacts to historic and archaeological resources was fully evaluated. See Draft SGEIS, Sections 3.9, 4.9.

8. *Questions 3.c. of the EAF, “the proposed action may involve dredging more than 100 cubic yards of material from a wetland or water body” should be checked “moderate to large impact may occur.”*

Response: As detailed in the Draft SGEIS, the development of the Park will likely begin south of the NYPA/National Grid transmission lines to avoid potential wetlands and state wetland adjacent areas to the maximum extent practicable, which are situated in the eastern portion of the Project site. This area includes approximately 732± total acres of prime developable land within the Park and has been identified as the prime developable area due to the anticipated absence of wetlands features, the generally flat topography, and the access to the surrounding transportation network and potential access points along NYS Route 31 and Caughdenoy Road.

Further, because the purpose of the EAF is to assist in making a determination of significance under SEQRA, any perceived mistake in the characterization of a potential adverse impact to zoning is irrelevant. OCIDA issued a Positive Declaration and Notice of Intent to prepare a Supplemental GEIS on December 8, 2021 and in the Draft SGEIS, potential adverse environmental impacts to ecological and water resources was fully evaluated. See Draft SGEIS, Sections 3.6, 3.8, 4.6, 4.8.



## **Procedural**

- 1. The analysis to similar facilities in the EIS is not adequate. The assumptions used for facilities in other locations is not an accurate comparison.***

Response: As this is a generic environmental review, there are no specific site plans or development concepts proposed for the Park. Despite this, OCIDA sought to as closely as possible consider the potential environmental impacts of the Project. It therefore took its stated goal to develop the expanded Park in order to enable OCIDA to better market the Project site in a more targeted manner to the semiconductor industry and used that to identify facilities in that industry in other locations. This included GlobalFoundries and Cree, both in New York State. These facilities were then evaluated in order to approximate the potential impacts of future development of the Park.

- 2. The Town of Clay, DEC, or DOT, not OCIDA, should have been Lead Agency particularly due to traffic and environmental impacts.***

Response: OCIDA acted as lead agency for the original GEIS in 2013. Following issuance of its resolution on December 8, 2020 to issue a Positive Declaration and Notice of Intent to Prepare a Supplemental Generic Environmental Impact Statement, OCIDA noticed its intent to assume the role of Lead Agency for the purpose of conducting a coordinated environmental review under SEQRA for the Project. *See* 6 NYCRR § 617.6.

OCIDA's notice was sent to all involved and interested agencies, including the Town of Clay, NYSDEC and NYSDOT. No agency objected to OCIDA serving as lead agency. This, however, does not mean that the Town of Clay, NYSDEC and NYSDOT have no involvement in the environmental review of the Project. All involved agencies retain whatever jurisdiction they have over the Project, are encouraged to participate in the SEQRA process and must make their own findings under SEQRA.

- 3. A commenter questioned why there was a negative declaration.***

Response: There was no negative declaration issued for the Project. To the contrary, OCIDA issued a Positive Declaration and Notice of Intent to Prepare a Supplemental Generic Environmental Impact Statement on December 8, 2020.

- 4. General comments were made regarding the adequacy of the public comment period and mechanisms for public comment. The public hearing should have been in-person, given the size and importance of the project. COVID restrictions are lifting. The 30-day comment period is not enough time to address all the issues.***

Response: SEQRA requires only that a thirty (30) day comment period be held on a draft environmental impact statement. 6 NYCRR § 617.9(a)(3). Here, OCIDA provided for longer than thirty (30) days. Counting from the date of the OCIDA resolution accepting the Draft SGEIS as complete for purposes of public comment and when the Draft SGEIS was made publically available, the comment period was for 43 days and also included a public hearing. The public hearing was held in accordance with modifications to Article 7 of the Public Officers Law (the "Open Meetings Law"), as modified by



New York Governor Andrew Cuomo's Executive Order 202.1, as extended in response to the COVID-19 pandemic.

5. *Comments were made that the project is shrouded in secrecy. The process was not transparent. The community has been allowed no involvement in the decision making process for the expansion. The public is not being told that the project will be 4 million square feet and 50 acres of paved area.*

Response: OCIDA has been fully transparent with respect to its proposal to expand the Park and this environmental review has been conducted in accordance with SEQRA's requirements for public notice and participation as well as the Open Meetings Law. The Draft SGEIS specifically evaluates the potential development to include "[a] combined total of approximately 4.0 million square feet (SF) of buildings in a campus like setting" and "[a]pproximately 50 acres of paved area for parking[.]" See Draft SGEIS, Section 1.1.5.

6. *OCIDA and Onondaga County has a financial interest in the project revenues which presents a conflict of interest relative to OCIDA serving as the Lead Agency. Questions were raised regarding whether a conflict of interest exists, or if SEQRA allows OCIDA to review and edit the EIS to its own liking. The environmental review is biased in favor of the project.*

Response: SEQRA contemplates, and actually requires, that an agency consider the environmental impacts of actions they directly undertake. Indeed, "[t]he basic purpose of SEQR is to incorporate the consideration of environmental factors into the existing planning, review and decision-making processes of state, regional and local government agencies at the earliest possible time. 6 NYCRR § 617.1(c). There is no conflict of interest. OCIDA has taken its obligations under SEQRA seriously and required the preparation of the Draft SGEIS to fully assess the potential for significant adverse environmental impacts and to ensure that any such impacts can be avoided, minimized or mitigated to the maximum extent practicable. OCIDA will ultimately weigh and balance this assessment of environmental considerations with social, economic and other essential considerations.

7. *OCIDA is required to perform a Programmatic EIS to consider the impacts within the context of a greater regional plan. NEPA prohibits segmentation.*

Response: National Environmental Protection Act ("NEPA") does not apply to the Project. See Response to Procedural/SEQRA Compliance Comment 11.

8. *Cumulative impacts are not adequately addressed as required by the criteria set for the in 6 NYCRR § 617.7(c). Mitigation does not adequately address all cumulative impacts.*

Response: Part 617.7(c) details the criteria by which a lead agency determines significance. Here, OCIDA issued a Positive Declaration and Notice of Intent to prepare a Supplemental GEIS on December 8, 2020 and in the Draft SGEIS, cumulative impacts were fully evaluated. See Draft SGEIS, Section 5.1. Further, avoidance, minimization and mitigation were discussed for each environmental resource. See, generally, Draft SGEIS, Section 4.0.



- 9. Questions were raised regarding the source and derivation of certain figures used throughout the EIS, including: the need for and derivation of 1253 acres, was this based on comparative projects; derivation of the 732 acre developable footprint, particularly with no currently proposed site plan; derivation of 4,000 employees.***

Response: The size of the Park and spacing requirements of potential structures that may be located in the Park were generated based upon similar facilities operating in New York and in other parts of the country. The Park location and size also considered the surrounding areas' land uses, transportation network and access points, natural and environmental features, and setback requirements for noise, vibration, and visual aesthetics for both the internal site development as well as existing features like the rail line, overhead power transmission lines, surrounding roadways, and adjacent residential communities.

The prime developable area footprint included the area that best avoided impacts to the previously mentioned existing conditions and environmental features at and near the Park.

- 10. Comments were made regarding whether the environmental review process has generally complied with the requirements under SEQRA, including timing, public notice and review. All residents in the Towns of Clay and Cicero should have been notified about the project.***

Response: OCIDA has fully complied with SEQRA's requirements for public notice and review. The Notice of Completion of the Draft SGEIS and Public Hearing were published in the NYSDEC Environmental Notice Bulletin on May 12, 2021, noticed in the Post Standard on May 9, 2021 and also posted to OCIDA's website at [Project Documents - Onondaga County Office of Economic Development \(ongoved.com\)](https://www.ongoved.com/ocida/project-documents/). See 6 NYCRR § 617.12(c). Further, the Draft SGEIS was made available for review at OCIDA's offices located at 333 West Washington St., Suite 130, Syracuse, New York 13202 and at the Town of Clay Town Hall located at 4401 Route 31, Clay, NY 13041. The Draft SGEIS was also posted to OCIDA's website at: <https://www.ongoved.com/ocida/project-documents/> and was made available from OCIDA upon request.

- 11. The impact on future generations have not been considered.***

Response: It is unclear what the comment is referring to relative to future generations. The impacts of the future development of the Park have been included within the various resource analyses done. See, generally, Draft SGEIS, Sections 3.0 and 4.0. The environmental review also considered growth inducing impacts as well as the irreversible and irretrievable commitment of physical resources. See Draft SGEIS, Sections 7.0 and 8.0

- 12. The commenters in support of the project do not reside in the area or live near it. The public hearing had invited business owners reading from prepared scripts on the economic impact, in favor of the project, but did not speak about the environmental impact of the project.***

Response: Comment noted. The transcript and record of comments received during the public comment period speak for themselves.



***13. Analysis of economic factors should not be included in an environmental impact statement. The definition of 'environment' in 6 NYCRR § 617.2 does not include economic impact.***

Response: See Response to Alternatives Comment 5.

**General**

***1. There were general comments on the overall thoroughness of the environmental impact review given a project of this size and magnitude.***

Response: OCIDA environmental review of the Park has been extensive. Originally culminating in a FGEIS in 2013 that evaluated the OCIDA has now conducted a supplemental environmental review that consider the delta of environmental impacts associated with an expanded footprint. Combined, OCIDA environmental review evaluates a broad spectrum of environmental resources and includes, where appropriate supporting studies and reports. All of this was premised on the generic nature of the Draft SGEIS. See 6 NYCRR § 617.10. See Response to Purpose and Need Comment 15.

***2. Statements were made concerning whether the project adequately complies with state and Federal regulatory standards relating to environmental justice.***

Response: It is unclear what standards the commenter is referencing. OCIDA has evaluated whether there are any environmental justice communities in the vicinity of the Park. Specifically, OCIDA reviewed the NYSDEC's Environmental Justice ("EJ") Potential Environmental Justice Area ("PEJA") maps as well as the United States Environmental Protection Agency's Environmental Justice Screening and Mapping Tool - Version 2020 ("EJSCREEN"). The PEJA's data is based on data from the 2014-2018 5-year American Community Survey ("ACS"), conducted by the US Census Bureau. The EPA's EJSCREEN is an environmental justice mapping and screening tool that provides EPA with a nationally consistent dataset and approach for combining environmental and demographic indicators.

This review of both screening tools did not reveal any potential environmental justice area communities within proximity to the Park. See also Final SGEIS, Section 5.1.

***3. The approval of individual SEQRA resolutions with respect to properties on Burnet Road constitutes segmentation.***

Response: Segmentation is "the division of the environmental review of an action such that various activities or stages are addressed under this Part as though they were independent, unrelated activities, needing individual determinations of significance." 6 NYCRR § 617.2(ah). Part 617.3(g) states that "[a]ctions commonly consist of a set of activities or steps" and that it is contrary to the intent of SEQRA to segment an action. As such, if a lead agency believes that a segmented review is warranted, "it must clearly state in its determination of significance, and any subsequent EIS, the supporting reasons and must demonstrate that such review is clearly no less protective of the environment." 6 NYCRR § 617.3(g)(1). The reason for this rule is that if a proposal is broken into enough pieces, each piece may not seem significant, although the impact from the sum of the pieces might be significant.





New York State Department of Environmental Conservation's SEQRA Handbook provides the test for segmentation, which consists of a series of questions for the lead agency to consider, including :<sup>5</sup> *purpose, time, location, impacts, ownership, common plan, utility and inducement.*

Here, there is no segmentation because there was no identified purchaser or specific plan for development at the time the SEQRA review was conducted such that the acquisition was not a separate part of a set of activities or steps' in a single action or project. *See Matter of GM Components Holdings, LLC v. Town of Lockport Indus. Dev. Agency*, 112 A.D.3d 1351 (4th Dep't 2013) ("[a]lthough LIDA considered only the impact of the acquisition and not the impact of potential development," that limited review did not constitute segmentation because although LIDA intends to sell the property to a potential developer, there was no identified purchaser or specific plan for development at the time the SEQRA review was conducted, and thus the acquisition is not a separate part of a set of activities or steps' in a single action or project.").

***4. More public meetings should be held. The residents want to meet with the County Executive in public.***

Response: Per the SEQRA Handbook, "[h]earings under SEQR are optional" and there is no requirement for public meetings. Per the regulations (6 NYCRR § 617.9(a)(4)),

In determining whether or not to hold a SEQR hearing, the lead agency will consider: the degree of interest in the action shown by the public or involved agencies; whether substantive or significant adverse environmental impacts have been identified; the adequacy of the mitigation measures and alternatives proposed; and the extent to which a public hearing can aid the agency decision-making processes by providing a forum for, or an efficient mechanism for the collection of, public comment.

Here, although not required, OCIDA opted to hold a public hearing on May 24, 2021. The purpose of the public hearing was to accept comments on the Draft SGEIS, not a question and answer session. Among the over 70 participants, there were 31 individuals that elected to provide verbal comments during the public hearing,. All who asked to speak were allowed to comment. No one was denied the opportunity to speak.

OCIDA would note that outside of this SEQRA process, the County Executive did hold an in-person public outreach meeting concerning the Project on June 27, 2021.

***5. Commenters made general comments/questions regarding how property values would be impacted. How would they be and were those impacts considered?***

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<sup>5</sup> These factors, and the SEQRA Handbook in general, have been repeatedly referenced and cited by courts interpreting SEQRA's provisions. *See e.g., Scott v. City of Buffalo*, 16 Misc. 3d 259 (Sup. Ct. Erie County 2006) (relying on NYSDEC's test for segmentation); *Scott v. City of Buffalo*, 20 Misc. 3d 1135(A) (Sup. Ct. Erie County, July 3, 2008) (unpublished) ("To evaluate these types of [segmentation] claims, Courts generally rely on the relevant factors identified by the [NYSDEC] in the SEQR[A] Handbook."); *see generally David's Lane – Pondview Preservation Ass'n v. Planning Bd.*, 216 A.D.2d 389 (2nd Dep't 1995) (citing NYSDEC's SEQRA Handbook as one basis for upholding a Village's negative declaration); *Matter of Association for Protection of Adirondacks Inc. v. Town Bd. of Town of Tupper Lake*, 17 Misc. 3d 1122(a) (Sup. Ct. Franklin County, Nov. 2, 2007) (unpublished) ("The SEQRA Handbook promulgated by the [NYS]DEC, whether in draft form or not, is a basic source material for agencies to use in interpreting SEQR[A].").



Response: See Response to Purpose and Need Comment 8. Based on the experience with GlobalFoundries in Malta, New York, property values are anticipated to increase.

- 6. *The DSGEIS describes the area as “prime developable land” due to the anticipated absence of wetland features, flat topography and the access to the surrounding transportation network and potential access points along NYS Rt. 31 and Caughdenoy Road, but the “prime developable land” used in this context does not address impacts on other physical conditions such as “existing patterns of population concentration, distribution, or growth, and existing community or neighborhood character.”***

Response: The entire Draft SGEIS evaluates the potential impacts of developing the prime developable area. This includes potential impacts to community character, population growth, etc. See, e.g., Draft SGEIS, Sections 3.0, 4.0 & 7.0.

- 7. *Commenter expressed general concern about how information, data, figures, etc. are developed in a GEIS.***

Response: OCIDA retained an environmental consultant to prepare the Draft SGEIS. The information, data and figures it used and compiled are discussed within the document and, where applicable, source information is noted. In many cases, publicly available information or other information maintained by a state or local agency was used. Examples for historic and archaeological resources include the statewide inventory of archaeological resources records, maintained by the New York State Museum and the New York Office of Parks, Recreation and Historic Preservation, and the New York State Cultural Resource Information System (NYS CRIS). See Draft SGEIS, Sections 3.9 & 3.9.1. In other instances, data was collected. For example, day-time ambient sound level data was collected at five representative locations around the Project site on Thursday, April 8, 2021, and April 27, 2021. See Draft SGEIS, Section 3.11.4 & Figure 3.11-1.

- 8. *A commenter concurred that by addressing the issues of various impact thresholds, permit criteria and mitigation measures anticipated for the expanded Park, including those attributes associated with large-scale semiconductor industrial development, in a Generic EIS format, the SEQRA process will define a set of threshold conditions or criteria under which potential future actions and development will be undertaken or approved, including any subsequent SEQRA compliance requirements.***

Response: Comments noted.



# APPENDIX A

## SEQRA Documentation



## **WHITE PINE COMMERCE PARK**

### **SEQRA RESOLUTION**

A regular meeting of the Onondaga County Industrial Development Agency (the "Agency") was convened in public session, remotely by conference call or similar service pursuant to New York State Executive Order 202.79 on December 8, 2020, at 8:00 a.m., local time.

The meeting was called to order by the (Vice) Chairman of the Agency and, upon roll being called, the following members of the Agency were:

**PRESENT:** Patrick Hogan  
Janice Herzog  
Victor Ianno  
Steve Morgan  
Susan Stanczyk  
Kevin Ryan

**ABSENT:** Fanny Villarreal

**ALSO PRESENT:** Robert M. Petrovich, Executive Director  
Jeffrey W. Davis, Esq., Agency Counsel  
Amanda M. Mirabito, Esq., Agency Counsel

The following resolution was offered by Susan Stanczyk, seconded by Janice Herzog, to wit:

#### **RESOLUTION CLASSIFYING A CERTAIN PROJECT AS A TYPE I ACTION, ISSUING A POSITIVE DECLARATION, AND DECLARING THE INTENT OF THE ONONDAGA COUNTY INDUSTRIAL DEVELOPMENT AGENCY TO BE LEAD AGENCY FOR THE PREPARATION OF A SUPPLEMENTAL GENERIC ENVIRONMENTAL IMPACT STATEMENT PURSUANT TO THE STATE ENVIRONMENTAL QUALITY REVIEW ACT**

WHEREAS, Onondaga County Industrial Development Agency (the "Agency") is authorized and empowered by the provisions of Chapter 1030 of the 1969 Laws of New York, constituting Title 1 of Article 18-A of the General Municipal Law, Chapter 24 of the Consolidated Laws of New York, as amended (the "Enabling Act"), Chapter 435 of the Laws of 1970 of the State of New York and Chapter 676 of the Laws of 1975 of the State of New York, as amended (said Chapter and the Enabling Act being hereinafter collectively referred to as the "Act") to promote, develop, encourage and assist in the acquiring, constructing, reconstructing, improving, maintaining, equipping and furnishing of manufacturing, warehousing, research, commercial and industrial facilities, among others, for the purpose of promoting, attracting and developing

economically sound commerce and industry to advance the job opportunities, health, general prosperity and economic welfare of the people of the State of New York, to improve their prosperity and standard of living, and to prevent unemployment and economic deterioration; and

WHEREAS, to accomplish its stated purposes, the Agency is authorized and empowered under the Act to acquire, construct, reconstruct and install "projects" (as defined in the Act) or to cause said projects to be acquired, constructed, reconstructed and installed, and to convey said projects or to lease said projects with the obligation to purchase; and

WHEREAS, the Agency currently owns White Pine Commerce Park ("Park") located northeast of the intersection of NYS Route 31 and Caughdenoy Road in the Town of Clay, Onondaga County, New York; and

WHEREAS, in an effort to transform the Park into a modern industrial park for advanced manufacturing and state-of-the-art industrial uses, the Agency previously performed a thorough environmental review of the Park and its anticipated environmental impacts pursuant to Article 8 of the Environmental Conservation Law of the State of New York, as amended, and the regulations of the Department of Environmental Conservation of the State of New York promulgated thereunder (collectively referred to hereinafter as "SEQRA"), which included, but was not limited to, the following: (1) classifying the Park project as a Type 1 action; (2) acting as Lead Agency for the purpose of a coordinated environmental review; (3) conducting necessary studies and holding required hearings in connection with the preparation of a Generic Environmental Impact Statement ("GEIS") to address anticipated potential impacts associated with the proposed multi-use industrial park; (4) preparation of a subsequent Final GEIS ("FGEIS") that incorporated the DGEIS by reference and included responses to public comments received; and (5) preparation and issuance by the Agency of a Findings Statement in October of 2013 that (a) concluded the project avoided or minimized adverse environmental impacts to the maximum extent practicable, (b) incorporated mitigation measures that were considered practicable, and (c) identified certain impact thresholds that, if exceeded, may require supplemental determinations of their significance and/or impact evaluation, and possibly mitigation measures in addition to those identified; and

WHEREAS, since 2013, the Agency has attempted to market the Park for development around the country to potential manufacturing and industrial users, but those efforts have been unsuccessful and the Park remains vacant; and

WHEREAS, through its marketing efforts and communications with desired tenants around the country, the Agency has determined that the Park is not geographically large enough and must be expanded significantly to be considered an attractive, viable location for prospective large- and small-scale manufacturing and industrial developers; and

WHEREAS, to improve the Agency's ability to market the Park to a larger, more diverse mix of large- and small-scale industrial, manufacturing, and commercial users, the Agency proposes to expand the existing Park to approximately 1,253 acres by acquiring approximately 800 additional acres to the north and east of the existing Park footprint, with such additional acreage comprised of certain parcels contiguous to the current Park, and which are generally located along

NYS Route 31 and the east and west sides of Burnett Road (the "Project" or "Action"); and

WHEREAS, pursuant to SEQRA, the Agency is required to make a determination whether the "action" (as said quoted term is defined in SEQRA) to be taken by the Agency may have a "significant impact on the environment" (as said quoted term is utilized in SEQRA) and the preliminary agreement of the Agency to undertake the Project constitutes such an action; and

WHEREAS, pursuant to SEQRA (6 N.Y.C.R.R. § 617.9(7)(i)), the Agency recognizes the proposed Project represents a significant change from the Park's current footprint that presents changed circumstances from those evaluated by the Agency under its prior SEQRA review in 2013; and

WHEREAS, the Agency has prepared and completed a Full Environmental Assessment Form (the "FEAF") to aid in determining whether undertaking the Project requires a supplemental GEIS; and

WHEREAS, the Agency has not approved the Project; and

**NOW, THEREFORE**, be it resolved by the members of the Onondaga County Industrial Development Agency as follows:

(1) Based upon an examination of the FEAF prepared for the Project, the criteria contained in 6 NYCRR §617.7(c), and based further upon the Agency's knowledge of the area surrounding the Project, and such further investigation of the Project and its potential significant environmental impacts as the Agency has deemed appropriate, the Agency makes the following findings and determinations with respect to the Project pursuant to SEQRA:

(A) The Project consists of the components described above in the seventh WHEREAS clause of this resolution.

(B) The Project constitutes a "Type I Action" (as said quoted term is defined in SEQRA).

(C) Based on its review and evaluation of the FEAF for the Project, a copy of which is attached hereto as Exhibit A, the Agency hereby determines that the Project represents a significant change from the Park's current footprint and will result in changed circumstances from those previously evaluated by the Agency in the DGEIS/FGEIS, and the Agency hereby determines that the preparation of a Supplemental GEIS ("SGEIS") is necessary to adequately identify and evaluate potential significant adverse impacts associated with the Project that are not addressed or are inadequately addressed in the existing DGEIS/FGEIS.

(D) The Agency therefore determines that the Project requires that a supplement to the FGEIS be prepared, and, therefore, a Notice of Intent to prepare a



supplemental GEIS (i.e., a positive declaration) shall be issued, a copy of which is attached hereto as Exhibit B.

(E) As a consequence of the foregoing, the Agency hereby declares its intent to act as "Lead Agency" (as said term is defined in SEQRA) with respect to a coordinated agency review of the Project pursuant to SEQRA, including the preparation of a SGEIS, as explained in the Notice of Intent attached hereto as Exhibit B.

(F) The Agency's counsel shall arrange for publication and distribution of this determination and notice of intent to be "Lead Agency" and is hereby authorized to take such actions as are necessary and appropriate to assist the Agency in fulfilling the requirements under SEQRA for the Project.

(2) A copy of this Resolution, together with the attachments hereto, shall be placed on file in the office of the Agency where the same shall be available for public inspection during business hours.

(3) This Resolution shall take effect immediately

The question of the adoption of the foregoing Resolution was duly put to a vote on roll call, which resulted as follows:

	<u>AYE</u>	<u>NAY</u>	<u>ABSENT</u>
Patrick Hogan	X		
Janice Herzog	X		
Victor Ianno	X		
Steve Morgan	X		
Susan Stanczyk	X		
Kevin Ryan	X		
Fanny Villarreal			X

The Resolution was thereupon declared duly adopted.

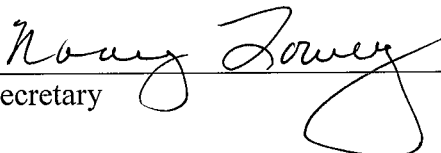
STATE OF NEW YORK                    )  
  ) SS.:  
COUNTY OF ONONDAGA                )

I, the undersigned Secretary of the Onondaga County Industrial Development Agency, DO HEREBY CERTIFY that I have compared the annexed extract of the minutes of the meeting of the Onondaga County Industrial Development Agency (the "Agency") held on December 8, 2020, with the original thereof on file in my office, and that the same (including all exhibits) is a true and correct copy of the proceedings of the Agency and of the whole of such original insofar as the same relates to the subject matters referred to therein.

I FURTHER CERTIFY that (i) all members of the Agency had due notice of such meeting, (ii) pursuant to Section 104 of the Public Officers Law (Open Meetings Law), such meeting was open to the general public and public notice of the time and place of such meeting was duly given in accordance with such Section 104, (iii) the meeting was in all respects duly held, and (iv) there was a quorum present throughout.

I FURTHER CERTIFY that, as of the date hereof, the attached resolution is in full force and effect and has not been amended, repealed or rescinded.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of the Agency this 8th day of December, 2020.

  
Secretary

(S E A L)

## **EXHIBIT A**

**Full Environmental Assessment Form**  
**Part 1 - Project and Setting**

**Instructions for Completing Part 1**

**Part 1 is to be completed by the applicant or project sponsor.** Responses become part of the application for approval or funding, are subject to public review, and may be subject to further verification.

Complete Part 1 based on information currently available. If additional research or investigation would be needed to fully respond to any item, please answer as thoroughly as possible based on current information; indicate whether missing information does not exist, or is not reasonably available to the sponsor; and, when possible, generally describe work or studies which would be necessary to update or fully develop that information.

Applicants/sponsors must complete all items in Sections A & B. In Sections C, D & E, most items contain an initial question that must be answered either “Yes” or “No”. If the answer to the initial question is “Yes”, complete the sub-questions that follow. If the answer to the initial question is “No”, proceed to the next question. Section F allows the project sponsor to identify and attach any additional information. Section G requires the name and signature of the applicant or project sponsor to verify that the information contained in Part 1 is accurate and complete.

**A. Project and Applicant/Sponsor Information.**

Name of Action or Project: White Pine Commerce Park (formerly known as the Clay Business Park)		
Project Location (describe, and attach a general location map): 5171 Route 31, Town of Clay, NY 13041		
Brief Description of Proposed Action (include purpose or need): The Onondaga County Industrial Development Agency (OCIDA) proposes to expand its White Pine Commerce Park (the Park) in the Town of Clay, Onondaga County, NY. The project site is approximately 1,250 acres, of which the County currently owns 450 acres. The expanded Park will be capable of supporting a mix of industrial and/or commercial uses that may include industrially related office, research, manufacturing, assembly, warehousing, data management, material processing and distribution facilities in a campus-like setting. The purpose of the proposed expansion will enable OCIDA to market the Park to a larger, more diverse mix of potential developers, allowing development of the site for advanced forms of manufacturing and state-of-the-art industrial uses to facilitate the creation of high-paying employment opportunities in Onondaga County. The Park has many important attributes that make it particularly well suited to large-scale industrial and/or commercial use. The Park is accessible from major nearby interstates and State and County highways. This includes Interstate 81 (I-81) via Exit 30 at NYS Route 31 in Cicero, approximately 2.2 miles east of the project site. The I-81 interchange at Bartell Road (Exit 31) is approximately 3 miles north of the site, and the Interstate 81/481 interchange is 4 miles to the southeast. The I-481/NYS Route 31 interchange is approximately 3.5 miles west of the Park. The New York State Thruway (I-90) is about 6.5 miles south of the Park. Syracuse Hancock International Airport is about 5 miles south of the Park along the I-81 corridor. <div style="text-align: right;">+</div>		
Name of Applicant/Sponsor: Onondaga County Industrial Development Agency (OCIDA)	Telephone: (315) 435-3770 E-Mail: economicdevelopment@ongov.net	
Address: 333 W Washington St #130		
City/PO: Syracuse	State: New York	Zip Code: 13202
Project Contact (if not same as sponsor; give name and title/role): Robert M. Petrovich – Executive Director	Telephone: (315) 435-3770 E-Mail: robertpetrovich@ongov.net	
Address:		
City/PO:	State:	Zip Code:
Property Owner (if not same as sponsor):	Telephone: E-Mail:	
Address:		
City/PO:	State:	Zip Code:

## B. Government Approvals

**B. Government Approvals, Funding, or Sponsorship.** (“Funding” includes grants, loans, tax relief, and any other forms of financial assistance.)

Government Entity	If Yes: Identify Agency and Approval(s) Required	Application Date (Actual or projected)
a. City Counsel, Town Board, <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No or Village Board of Trustees	see attachment	tbd
b. City, Town or Village Planning Board or Commission <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	see attachment	tbd
c. City, Town or Village Zoning Board of Appeals <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	see attachment	tbd
d. Other local agencies <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	see attachment	tbd
e. County agencies <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	see attachment	tbd
f. Regional agencies <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	see attachment	tbd
g. State agencies <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	see attachment	tbd
h. Federal agencies <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	see attachment	tbd
<p>i. Coastal Resources.</p> <p><i>i.</i> Is the project site within a Coastal Area, or the waterfront area of a Designated Inland Waterway? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><i>ii.</i> Is the project site located in a community with an approved Local Waterfront Revitalization Program? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><i>iii.</i> Is the project site within a Coastal Erosion Hazard Area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>		

## C. Planning and Zoning

### C.1. Planning and zoning actions.

Will administrative or legislative adoption, or amendment of a plan, local law, ordinance, rule or regulation be the only approval(s) which must be granted to enable the proposed action to proceed? ☐ Yes ☒ No

- If Yes, complete sections C, F and G.
- If No, proceed to question C.2 and complete all remaining sections and questions in Part 1

### C.2. Adopted land use plans.

a. Do any municipally- adopted (city, town, village or county) comprehensive land use plan(s) include the site where the proposed action would be located? ☒ Yes ☐ No

If Yes, does the comprehensive plan include specific recommendations for the site where the proposed action would be located? ☒ Yes ☐ No

b. Is the site of the proposed action within any local or regional special planning district (for example: Greenway; Brownfield Opportunity Area (BOA); designated State or Federal heritage area; watershed management plan; or other?) ☐ Yes ☒ No

If Yes, identify the plan(s):

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c. Is the proposed action located wholly or partially within an area listed in an adopted municipal open space plan, or an adopted municipal farmland protection plan? ☐ Yes ☒ No

If Yes, identify the plan(s):

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**C.3. Zoning**

a. Is the site of the proposed action located in a municipality with an adopted zoning law or ordinance. ☒ Yes ☐ No  
 If Yes, what is the zoning classification(s) including any applicable overlay district?  
 A portion of the site is zoned Residential Agricultural District (RA-100), another portion is zoned Industrial 2 (I-2), and a small portion of the site zoned as One Family Residential (R-15). The Project is consistent with the intended uses in the community development plan. Some rezoning will be needed.

b. Is the use permitted or allowed by a special or conditional use permit? ☒ Yes ☐ No

c. Is a zoning change requested as part of the proposed action? ☒ Yes ☐ No  
 If Yes,  
 i. What is the proposed new zoning for the site? I-2 Industrial 2

**C.4. Existing community services.**

a. In what school district is the project site located? North Syracuse Central School District

b. What police or other public protection forces serve the project site?  
Onondaga County Sheriff's Department

c. Which fire protection and emergency medical services serve the project site?  
Clay Volunteer Fire Dept (VFD), Meyers Corner FD, Brewerton Fire District, North Syracuse FD, Caughdenoy VFD, Emergency Medical -NAVAC & NOVA

d. What parks serve the project site?  
Two Town of Clay parks are located within one mile of the project site. These include Meltzer Park and the Clay Historical Park.

#### D. Project Details

### D.1. Proposed and Potential Development

a. What is the general nature of the proposed action (e.g., residential, industrial, commercial, recreational; if mixed, include all components)? OCIDA proposes to develop a modern industrial and commercial park on the County's White Pine Commerce Park consisting of industrial and commercial uses that may include office, research, manufacturing, warehouse, assembly, or distribution facilities.

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b. a. Total acreage of the site of the proposed action? 1,253+/- acres  
 b. Total acreage to be physically disturbed? TBD acres  
 c. Total acreage (project site and any contiguous properties) owned or controlled by the applicant or project sponsor? 646 acres

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c. Is the proposed action an expansion of an existing project or use? ☒ Yes ☐ No  
 i. If Yes, what is the approximate percentage of the proposed expansion and identify the units (e.g., acres, miles, housing units, square feet)? % 178 Units: 800 acres

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d. Is the proposed action a subdivision, or does it include a subdivision? ☐ Yes ☒ No  
 If Yes,  
 i. Purpose or type of subdivision? (e.g., residential, industrial, commercial; if mixed, specify types) \_\_\_\_\_  
 ii. Is a cluster/conservation layout proposed? ☐ Yes ☐ No  
 iii. Number of lots proposed? \_\_\_\_\_  
 iv. Minimum and maximum proposed lot sizes? Minimum \_\_\_\_\_ Maximum \_\_\_\_\_

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e. Will the proposed action be constructed in multiple phases? ☒ Yes ☐ No  
 i. If No, anticipated period of construction: \_\_\_\_\_ months  
 ii. If Yes:  
 • Total number of phases anticipated 2  
 • Anticipated commencement date of phase 1 (including demolition) TBD month \_\_\_\_\_ year  
 • Anticipated completion date of final phase TBD month \_\_\_\_\_ year  
 • Generally describe connections or relationships among phases, including any contingencies where progress of one phase may determine timing or duration of future phases: \_\_\_\_\_  
 Phase I may include development of manufacturing facilities on a portion of the property. Phase II is envisioned as primarily research and development activities on a smaller portion of the property.



f. Does the project include new residential uses? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span> If Yes, show numbers of units proposed.				
	<u>One Family</u>	<u>Two Family</u>	<u>Three Family</u>	<u>Multiple Family (four or more)</u>
Initial Phase	_____	_____	_____	_____
At completion	_____	_____	_____	_____
of all phases	_____	_____	_____	_____

g. Does the proposed action include new non-residential construction (including expansions)? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span> If Yes,	
i. Total number of structures <u>15 - 30</u> ii. Dimensions (in feet) of largest proposed structure: <u>40' - 70'</u> height; <u>1250'-1500'</u> width; and <u>1250'-1500'</u> length iii. Approximate extent of building space to be heated or cooled: <u>4 - 5 million</u> square feet	

h. Does the proposed action include construction or other activities that will result in the impoundment of any liquids, such as creation of a water supply, reservoir, pond, lake, waste lagoon or other storage? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span> If Yes,	
i. Purpose of the impoundment: <u>stormwater management</u> ii. If a water impoundment, the principal source of the water: <input type="checkbox"/> Ground water <input type="checkbox"/> Surface water streams <input checked="" type="checkbox"/> Other specify: <u>stormwater</u> iii. If other than water, identify the type of impounded/contained liquids and their source. _____ iv. Approximate size of the proposed impoundment. Volume: _____ TBD million gallons; surface area: _____ TBD acres v. Dimensions of the proposed dam or impounding structure: _____ TBD height; _____ TBD length vi. Construction method/materials for the proposed dam or impounding structure (e.g., earth fill, rock, wood, concrete): <u>TBD</u>	

**D.2. Project Operations**

a. Does the proposed action include any excavation, mining, or dredging, during construction, operations, or both? (Not including general site preparation, grading or installation of utilities or foundations where all excavated materials will remain onsite) <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span> If Yes:	
i. What is the purpose of the excavation or dredging? _____ ii. How much material (including rock, earth, sediments, etc.) is proposed to be removed from the site? • Volume (specify tons or cubic yards): _____ • Over what duration of time? _____ iii. Describe nature and characteristics of materials to be excavated or dredged, and plans to use, manage or dispose of them. _____ _____ iv. Will there be onsite dewatering or processing of excavated materials? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span> If yes, describe. _____ _____ v. What is the total area to be dredged or excavated? _____ TBD acres vi. What is the maximum area to be worked at any one time? _____ TBD acres vii. What would be the maximum depth of excavation or dredging? _____ TBD feet viii. Will the excavation require blasting? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span> ix. Summarize site reclamation goals and plan: _____ <u>Conduct excavations and restoration consistent with regulatory permit requirements and guidance.</u>	

b. Would the proposed action cause or result in alteration of, increase or decrease in size of, or encroachment into any existing wetland, waterbody, shoreline, beach or adjacent area? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span> If Yes:	
i. Identify the wetland or waterbody which would be affected (by name, water index number, wetland map number or geographic description): <u>Potentially NYSDEC Class C Stream No. 899-10 (Tributaries of Oneida River); NYSDEC Wetlands BRE-11 &amp; BRE-14; and onsite NWI mapped wetlands.</u>	

ii. Describe how the proposed action would affect that waterbody or wetland, e.g. excavation, fill, placement of structures, or alteration of channels, banks and shorelines. Indicate extent of activities, alterations and additions in square feet or acres:  
Specific impacts will be determined by site plan development; potential impacts could include placement of fill or structures for outfall locations.

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iii. Will the proposed action cause or result in disturbance to bottom sediments? ☐ Yes ☒ No  
 If Yes, describe: \_\_\_\_\_

iv. Will the proposed action cause or result in the destruction or removal of aquatic vegetation? ☐ Yes ☒ No  
 If Yes:

- acres of aquatic vegetation proposed to be removed: \_\_\_\_\_
- expected acreage of aquatic vegetation remaining after project completion: \_\_\_\_\_
- purpose of proposed removal (e.g. beach clearing, invasive species control, boat access): \_\_\_\_\_
- proposed method of plant removal: \_\_\_\_\_
- if chemical/herbicide treatment will be used, specify product(s): \_\_\_\_\_

v. Describe any proposed reclamation/mitigation following disturbance: \_\_\_\_\_  
 TBD

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c. Will the proposed action use, or create a new demand for water? ☒ Yes ☐ No  
 If Yes:

i. Total anticipated water usage/demand per day: \_\_\_\_\_ TBD gallons/day

ii. Will the proposed action obtain water from an existing public water supply? ☒ Yes ☐ No  
 If Yes:

- Name of district or service area: Town of Clay UWD / Onondaga County Water Authority (line owned by Metropolitan Water Board)
- Does the existing public water supply have capacity to serve the proposal? TBD ☐ Yes ☐ No
- Is the project site in the existing district? ☐ Yes ☐ No
- Is expansion of the district needed? ☐ Yes ☐ No
- Do existing lines serve the project site? ☐ Yes ☐ No

iii. Will line extension within an existing district be necessary to supply the project? ☐ Yes ☐ No  
 If Yes:

- Describe extensions or capacity expansions proposed to serve this project: TBD
- Source(s) of supply for the district: \_\_\_\_\_

iv. Is a new water supply district or service area proposed to be formed to serve the project site? ☐ Yes ☒ No  
 If, Yes:

- Applicant/sponsor for new district: \_\_\_\_\_
- Date application submitted or anticipated: \_\_\_\_\_
- Proposed source(s) of supply for new district: \_\_\_\_\_

v. If a public water supply will not be used, describe plans to provide water supply for the project: \_\_\_\_\_

vi. If water supply will be from wells (public or private), what is the maximum pumping capacity: \_\_\_\_\_ gallons/minute.

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d. Will the proposed action generate liquid wastes? ☒ Yes ☐ No  
 If Yes:

i. Total anticipated liquid waste generation per day: \_\_\_\_\_ TBD gallons/day

ii. Nature of liquid wastes to be generated (e.g., sanitary wastewater, industrial; if combination, describe all components and approximate volumes or proportions of each): \_\_\_\_\_  
Sanitary wastewater, potentially industrial associated with future industrial processes. Nature and volume of liquid waste to be generated are to be determined.

iii. Will the proposed action use any existing public wastewater treatment facilities? ☒ Yes ☐ No  
 If Yes:

- Name of wastewater treatment plant to be used: Oak Orchard Wastewater Treatment Plant
- Name of district: Onondaga County Consolidated Sewer District
- Does the existing wastewater treatment plant have capacity to serve the project? TBD. Limiting factor may be ☒ Yes ☐ No
- Is the project site in the existing district? BOD not volume. ☒ Yes ☐ No
- Is expansion of the district needed? ☐ Yes ☒ No

- Do existing sewer lines serve the project site? ☐ Yes ☒ No
- Will a line extension within an existing district be necessary to serve the project? ☒ Yes ☐ No

If Yes:

- Describe extensions or capacity expansions proposed to serve this project: \_\_\_\_\_

Installation of dual and parallel 6-inch and 12-inch diameter PVC force mains for a total of approximately 4.3 miles. Necessary improvements to the existing OOWT Plant to accommodate the project are being evaluated.

- iv. Will a new wastewater (sewage) treatment district be formed to serve the project site? ☒ Yes ☐ No

If Yes:

- Applicant/sponsor for new district: OCIDA
- Date application submitted or anticipated: TBD
- What is the receiving water for the wastewater discharge? Oneida River

- v. If public facilities will not be used, describe plans to provide wastewater treatment for the project, including specifying proposed receiving water (name and classification if surface discharge or describe subsurface disposal plans):

- vi. Describe any plans or designs to capture, recycle or reuse liquid waste: \_\_\_\_\_

- e. Will the proposed action disturb more than one acre and create stormwater runoff, either from new point sources (i.e. ditches, pipes, swales, curbs, gutters or other concentrated flows of stormwater) or non-point source (i.e. sheet flow) during construction or post construction? ☒ Yes ☐ No

If Yes:

- i. How much impervious surface will the project create in relation to total size of project parcel?

\_\_\_\_ Square feet or TBD acres (impervious surface)

Square feet or 1253 acres (parcel size)

- ii. Describe types of new point sources. Ditches, pipes, curbs, gutters, detention pond outfalls, etc.

- iii. Where will the stormwater runoff be directed (i.e. on-site stormwater management facility/structures, adjacent properties, groundwater, on-site surface water or off-site surface waters)?

Onsite stormwater management facility and/or offsite discharge to tributaries of Oneida River.

- If to surface waters, identify receiving water bodies or wetlands: Oneida River

- Will stormwater runoff flow to adjacent properties? ☐ Yes ☒ No

- iv. Does the proposed plan minimize impervious surfaces, use pervious materials or collect and re-use stormwater? ☒ Yes ☐ No

- f. Does the proposed action include, or will it use on-site, one or more sources of air emissions, including fuel combustion, waste incineration, or other processes or operations? ☒ Yes ☐ No

If Yes, identify:

- i. Mobile sources during project operations (e.g., heavy equipment, fleet or delivery vehicles)

Delivery and employee vehicles.

- ii. Stationary sources during construction (e.g., power generation, structural heating, batch plant, crushers)

Potentially power generation.

- iii.* Stationary sources during operations (e.g., process emissions, large boilers, electric generation)

Site tenant activity may produce process emissions. Certain facilities may require back-up power generation.

- g. Will any air emission sources named in D.2.f (above), require a NY State Air Registration, Air Facility Permit, or Federal Clean Air Act Title IV or Title V Permit? ☒ Yes ☐ No

If Yes:

- i. Is the project site located in an Air quality non-attainment area? (Area routinely or periodically fails to meet ambient air quality standards for all or some parts of the year) ☐ Yes ☒ No

- ii. In addition to emissions as calculated in the application, the project will generate:

- \_\_\_\_\_ TBD Tons/year (short tons) of Carbon Dioxide (CO<sub>2</sub>)
- \_\_\_\_\_ TBD Tons/year (short tons) of Nitrous Oxide (N<sub>2</sub>O)
- \_\_\_\_\_ TBD Tons/year (short tons) of Perfluorocarbons (PFCs)
- \_\_\_\_\_ TBD Tons/year (short tons) of Sulfur Hexafluoride (SF<sub>6</sub>)
- \_\_\_\_\_ TBD Tons/year (short tons) of Carbon Dioxide equivalent of Hydrofluorocarbons (HFCs)
- \_\_\_\_\_ TBD Tons/year (short tons) of Hazardous Air Pollutants (HAPs)

<p>h. Will the proposed action generate or emit methane (including, but not limited to, sewage treatment plants, landfills, composting facilities)? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span></p> <p>If Yes:</p> <p>i. Estimate methane generation in tons/year (metric): _____</p> <p>ii. Describe any methane capture, control or elimination measures included in project design (e.g., combustion to generate heat or electricity, flaring): _____</p>			
<p>i. Will the proposed action result in the release of air pollutants from open-air operations or processes, such as quarry or landfill operations? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span></p> <p>If Yes: Describe operations and nature of emissions (e.g., diesel exhaust, rock particulates/dust): _____</p>			
<p>j. Will the proposed action result in a substantial increase in traffic above present levels or generate substantial new demand for transportation facilities or services? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>If Yes:</p> <p>i. When is the peak traffic expected (Check all that apply): <input checked="" type="checkbox"/> Morning <input checked="" type="checkbox"/> Evening <input checked="" type="checkbox"/> Weekend  <input type="checkbox"/> Randomly between hours of _____ to _____.</p> <p>ii. For commercial activities only, projected number of truck trips/day and type (e.g., semi trailers and dump trucks): _____  10 to 30 trucks/peak hour (approximately 2% to 5% of vehicle trips/hr for 870,000 SF logistics, warehousing, and/or shipping &amp; receiving space)</p> <p>iii. Parking spaces: Existing <u>0</u> Proposed <u>&gt;500</u> Net increase/decrease <u>&gt;500</u></p> <p>iv. Does the proposed action include any shared use parking? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span></p> <p>v. If the proposed action includes any modification of existing roads, creation of new roads or change in existing access, describe:  <u>Caughdenoy Road/NYS Route 31 improvements; right-in driveway on NYS Route 31; widen Caughdenoy Road; signal timing adjustments, I-81 ramps</u></p> <p>vi. Are public/private transportation service(s) or facilities available within ½ mile of the proposed site? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span></p> <p>vii. Will the proposed action include access to public transportation or accommodations for use of hybrid, electric or other alternative fueled vehicles? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span></p> <p>viii. Will the proposed action include plans for pedestrian or bicycle accommodations for connections to existing pedestrian or bicycle routes? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span></p>			
<p>k. Will the proposed action (for commercial or industrial projects only) generate new or additional demand for energy? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>If Yes:</p> <p>i. Estimate annual electricity demand during operation of the proposed action: _____  <u>TBD</u></p> <p>ii. Anticipated sources/suppliers of electricity for the project (e.g., on-site combustion, on-site renewable, via grid/local utility, or other):  <u>National Grid</u></p> <p>iii. Will the proposed action require a new, or an upgrade, to an existing substation? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span></p>			
<p>l. Hours of operation. Answer all items which apply.</p> <table style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>i. During Construction:</p> <ul style="list-style-type: none"> <li>• Monday - Friday: <u>7 AM - 7 PM</u></li> <li>• Saturday: <u>7 AM - 7 PM</u></li> <li>• Sunday: <u>N/A</u></li> <li>• Holidays: <u>N/A</u></li> </ul> </td> <td style="width: 50%; vertical-align: top;"> <p>ii. During Operations:</p> <ul style="list-style-type: none"> <li>• Monday - Friday: <u>24 hours/day</u></li> <li>• Saturday: <u>24 hours/day</u></li> <li>• Sunday: <u>24 hours/day</u></li> <li>• Holidays: <u>24 hours/day</u></li> </ul> </td> </tr> </table>		<p>i. During Construction:</p> <ul style="list-style-type: none"> <li>• Monday - Friday: <u>7 AM - 7 PM</u></li> <li>• Saturday: <u>7 AM - 7 PM</u></li> <li>• Sunday: <u>N/A</u></li> <li>• Holidays: <u>N/A</u></li> </ul>	<p>ii. During Operations:</p> <ul style="list-style-type: none"> <li>• Monday - Friday: <u>24 hours/day</u></li> <li>• Saturday: <u>24 hours/day</u></li> <li>• Sunday: <u>24 hours/day</u></li> <li>• Holidays: <u>24 hours/day</u></li> </ul>
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<p>m. Will the proposed action produce noise that will exceed existing ambient noise levels during construction, operation, or both? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>If yes:</p> <p>i. Provide details including sources, time of day and duration:</p> <p>Noise generated from construction (M-F 7am-7pm) and site operations (24/7) are expected to contribute to sound levels within the Town of Clay Code. There is a potential for project noise to exceed ambient noise levels. Site layout will mitigate operational noise levels to the greatest extent possible.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>ii. Will the proposed action remove existing natural barriers that could act as a noise barrier or screen? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>Describe: <u>Onsite tree removal is proposed as part of the site development. Site layout and the possible implementation of berms will mitigate this.</u></p>	
<p>n. Will the proposed action have outdoor lighting? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>If yes:</p> <p>i. Describe source(s), location(s), height of fixture(s), direction/aim, and proximity to nearest occupied structures:</p> <p>Light sources could include pole-mounted and/or building-mounted. Luminaries which are dark-sky friendly, high-efficiency LED lights with cut off shields to provide uniform and energy conscious illumination to walkways and parking lots will be implemented to the greatest extent possible.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>ii. Will proposed action remove existing natural barriers that could act as a light barrier or screen? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>Describe: <u>Onsite tree removal is proposed as part of site development.</u></p>	
<p>o. Does the proposed action have the potential to produce odors for more than one hour per day? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span></p> <p>If Yes, describe possible sources, potential frequency and duration of odor emissions, and proximity to nearest occupied structures: _____</p> <p>_____</p> <p>_____</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>p. Will the proposed action include any bulk storage of petroleum (combined capacity of over 1,100 gallons) or chemical products 185 gallons in above ground storage or any amount in underground storage? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>If Yes:</p> <p>i. Product(s) to be stored <u>Petroleum, miscellaneous chemicals needed to support manufacturing and research &amp; development.</u></p> <p>ii. Volume(s) <u>TBD</u> per unit time _____ (e.g., month, year)</p> <p>iii. Generally, describe the proposed storage facilities: _____</p> <p><u>Tanks and containers that are compliant with regulations. Secondary containment structures, as warranted.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>q. Will the proposed action (commercial, industrial and recreational projects only) use pesticides (i.e., herbicides, insecticides) during construction or operation? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span></p> <p>If Yes:</p> <p>i. Describe proposed treatment(s): _____</p> <p>_____</p> <p>_____</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>ii. Will the proposed action use Integrated Pest Management Practices? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p>	
<p>r. Will the proposed action (commercial or industrial projects only) involve or require the management or disposal of solid waste (excluding hazardous materials)? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>If Yes:</p> <p>i. Describe any solid waste(s) to be generated during construction or operation of the facility:</p> <ul style="list-style-type: none"> <li>• Construction: _____ TBD tons per _____ day (unit of time)</li> <li>• Operation : _____ 20-30 tons per _____ day (unit of time)</li> </ul> <p>ii. Describe any proposals for on-site minimization, recycling or reuse of materials to avoid disposal as solid waste:</p> <ul style="list-style-type: none"> <li>• Construction: <u>Onsite recycling will be provided and privately hauled to recycling facility.</u></li> <li>• Operation: <u>Onsite recycling will be provided and privately hauled to recycling facility.</u></li> </ul> <p>iii. Proposed disposal methods/facilities for solid waste generated on-site:</p> <ul style="list-style-type: none"> <li>• Construction: <u>Solid waste will be handled by a private contractor or municipality.</u></li> <li>• Operation: <u>Solid waste will be handled by a private contractor or municipality.</u></li> </ul>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

s. Does the proposed action include construction or modification of a solid waste management facility? ☐ Yes ☒ No

If Yes:

i. Type of management or handling of waste proposed for the site (e.g., recycling or transfer station, composting, landfill, or other disposal activities): \_\_\_\_\_

ii. Anticipated rate of disposal/processing:

- \_\_\_\_\_ Tons/month, if transfer or other non-combustion/thermal treatment, or
- \_\_\_\_\_ Tons/hour, if combustion or thermal treatment

iii. If landfill, anticipated site life: \_\_\_\_\_ years

t. Will the proposed action at the site involve the commercial generation, treatment, storage, or disposal of hazardous waste? ☒ Yes ☐ No

If Yes:

i. Name(s) of all hazardous wastes or constituents to be generated, handled or managed at facility: \_\_\_\_\_  
TBD

ii. Generally describe processes or activities involving hazardous wastes or constituents: \_\_\_\_\_  
Manufacturing, laboratory chemicals.

iii. Specify amount to be handled or generated \_\_\_\_\_ tons/month

iv. Describe any proposals for on-site minimization, recycling or reuse of hazardous constituents: \_\_\_\_\_  
Re-use and recycle, whenever possible.

v. Will any hazardous wastes be disposed at an existing offsite hazardous waste facility? ☒ Yes ☐ No

If Yes: provide name and location of facility: \_\_\_\_\_  
TBD

If No: describe proposed management of any hazardous wastes which will not be sent to a hazardous waste facility: \_\_\_\_\_

## E. Site and Setting of Proposed Action

**E.1. Land uses on and surrounding the project site**

a. Existing land uses.

i. Check all uses that occur on, adjoining and near the project site.

☐ Urban ☒ Industrial ☒ Commercial ☒ Residential (suburban) ☒ Rural (non-farm)

☒ Forest ☒ Agriculture ☐ Aquatic ☐ Other (specify): \_\_\_\_\_

ii. If mix of uses, generally describe:

The site is bounded by highway commercial uses to the south, industrial uses to the west, residential agricultural use to the north, and commercial, residential, and undeveloped lands to the east.

b. Land uses and covertypes on the project site. Values provided are estimates.

Land use or Covertypes	Current Acreage	Acreage After Project Completion	Change (Acres +/-)
• Roads, buildings, and other paved or impervious surfaces	5	200 to 250	+ 195 to 245
• Forested	750 combined	500 to 550 combined	- 200 to 250 combined
• Meadows, grasslands or brushlands (non-agricultural, including abandoned agricultural)	20	0	- 20
• Agricultural (includes active orchards, field, greenhouse etc.)	10	20 to 30	+ 10 to 20
• Surface water features (lakes, ponds, streams, rivers, etc.)	469	469	0
• Wetlands (freshwater or tidal)	0	0	0
• Non-vegetated (bare rock, earth or fill)	0	0	0
• Other Describe: _____	N/A	N/A	N/A



c. Is the project site presently used by members of the community for public recreation? i. If Yes: explain: _____	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
d. Are there any facilities serving children, the elderly, people with disabilities (e.g., schools, hospitals, licensed day care centers, or group homes) within 1500 feet of the project site? If Yes, i. Identify Facilities: The Cottages at Garden Grove is a nursing home located approximately 200 ft. east of the site at 5460 Meltzer Ct. in Cicero; Grace Evangelical Covenant Church is located at 5300 NY-31 in Clay, and ~200 ft. south of the proposed project site. The church runs a pre-school program.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
e. Does the project site contain an existing dam? If Yes: i. Dimensions of the dam and impoundment: <ul style="list-style-type: none"> <li>• Dam height: _____ feet</li> <li>• Dam length: _____ feet</li> <li>• Surface area: _____ acres</li> <li>• Volume impounded: _____ gallons OR acre-feet</li> </ul> ii. Dam's existing hazard classification: _____ iii. Provide date and summarize results of last inspection: _____ _____ _____	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
f. Has the project site ever been used as a municipal, commercial or industrial solid waste management facility, or does the project site adjoin property which is now, or was at one time, used as a solid waste management facility? If Yes: i. Has the facility been formally closed? <ul style="list-style-type: none"> <li>• If yes, cite sources/documentation: _____</li> </ul> ii. Describe the location of the project site relative to the boundaries of the solid waste management facility: _____ _____ _____	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <input type="checkbox"/> Yes <input type="checkbox"/> No
g. Have hazardous wastes been generated, treated and/or disposed of at the site, or does the project site adjoin property which is now or was at one time used to commercially treat, store and/or dispose of hazardous waste? If Yes: i. Describe waste(s) handled and waste management activities, including approximate time when activities occurred: _____ _____ _____	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
h. Potential contamination history. Has there been a reported spill at the proposed project site, or have any remedial actions been conducted at or adjacent to the proposed site? If Yes: i. Is any portion of the site listed on the NYSDEC Spills Incidents database or Environmental Site Remediation database? Check all that apply: <input checked="" type="checkbox"/> Yes – Spills Incidents database      Provide DEC ID number(s): Spill No. 2005446 <input type="checkbox"/> Yes – Environmental Site Remediation database      Provide DEC ID number(s): _____ <input type="checkbox"/> Neither database ii. If site has been subject of RCRA corrective activities, describe control measures: _____ <u>Not applicable</u> _____ iii. Is the project within 2000 feet of any site in the NYSDEC Environmental Site Remediation database? If yes, provide DEC ID number(s): _____ iv. If yes to (i), (ii) or (iii) above, describe current status of site(s): _____ _____ _____	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

v. Is the project site subject to an institutional control limiting property uses? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>													
<ul style="list-style-type: none"> <li>• If yes, DEC site ID number: _____</li> <li>• Describe the type of institutional control (e.g., deed restriction or easement): _____</li> <li>• Describe any use limitations: _____</li> <li>• Describe any engineering controls: _____</li> <li>• Will the project affect the institutional or engineering controls in place? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> <li>• Explain: _____</li> </ul>													
<b>E.2. Natural Resources On or Near Project Site</b>													
a. What is the average depth to bedrock on the project site? <span style="float: right;">_____ 10-15 feet</span>													
b. Are there bedrock outcroppings on the project site? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span> If Yes, what proportion of the site is comprised of bedrock outcroppings? _____ %													
c. Predominant soil type(s) present on project site: <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="border-bottom: 1px solid black;">Niagara silt loam, 0 to 4% slopes</td> <td style="text-align: right; border-bottom: 1px solid black;">41.56 %</td> </tr> <tr> <td style="border-bottom: 1px solid black;">Collamer silt loam, 2 to 6% slopes</td> <td style="text-align: right; border-bottom: 1px solid black;">26.95 %</td> </tr> <tr> <td style="border-bottom: 1px solid black;">Hilton loam, 3 to 8% slopes</td> <td style="text-align: right; border-bottom: 1px solid black;">5.9 %</td> </tr> </table>		Niagara silt loam, 0 to 4% slopes	41.56 %	Collamer silt loam, 2 to 6% slopes	26.95 %	Hilton loam, 3 to 8% slopes	5.9 %						
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d. What is the average depth to the water table on the project site? Average: _____ 4.5 feet													
e. Drainage status of project site soils: <table style="width: 100%; border-collapse: collapse;"> <tr> <td><input checked="" type="checkbox"/> Well Drained:</td> <td style="text-align: right;">5 % of site</td> </tr> <tr> <td><input checked="" type="checkbox"/> Moderately Well Drained:</td> <td style="text-align: right;">42 % of site</td> </tr> <tr> <td><input checked="" type="checkbox"/> Poorly Drained</td> <td style="text-align: right;">53 % of site</td> </tr> </table>		<input checked="" type="checkbox"/> Well Drained:	5 % of site	<input checked="" type="checkbox"/> Moderately Well Drained:	42 % of site	<input checked="" type="checkbox"/> Poorly Drained	53 % of site						
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<input checked="" type="checkbox"/> Moderately Well Drained:	42 % of site												
<input checked="" type="checkbox"/> Poorly Drained	53 % of site												
f. Approximate proportion of proposed action site with slopes: <table style="width: 100%; border-collapse: collapse;"> <tr> <td><input checked="" type="checkbox"/> 0-10%:</td> <td style="text-align: right;">98.46 % of site</td> </tr> <tr> <td><input checked="" type="checkbox"/> 10-15%:</td> <td style="text-align: right;">0.92 % of site</td> </tr> <tr> <td><input checked="" type="checkbox"/> 15% or greater:</td> <td style="text-align: right;">0.62 % of site</td> </tr> </table>		<input checked="" type="checkbox"/> 0-10%:	98.46 % of site	<input checked="" type="checkbox"/> 10-15%:	0.92 % of site	<input checked="" type="checkbox"/> 15% or greater:	0.62 % of site						
<input checked="" type="checkbox"/> 0-10%:	98.46 % of site												
<input checked="" type="checkbox"/> 10-15%:	0.92 % of site												
<input checked="" type="checkbox"/> 15% or greater:	0.62 % of site												
g. Are there any unique geologic features on the project site? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span> If Yes, describe: _____													
h. Surface water features.													
i. Does any portion of the project site contain wetlands or other waterbodies (including streams, rivers, ponds or lakes)? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span>													
ii. Do any wetlands or other waterbodies adjoin the project site? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span>													
If Yes to either <i>i</i> or <i>ii</i> , continue. If No, skip to E.2.i.													
iii. Are any of the wetlands or waterbodies within or adjoining the project site regulated by any federal, state or local agency? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span>													
iv. For each identified regulated wetland and waterbody on the project site, provide the following information: <table style="width: 100%; border-collapse: collapse;"> <tr> <td>• Streams:</td> <td>Name <u>899-10</u></td> <td>Classification <u>C</u></td> </tr> <tr> <td>• Lakes or Ponds:</td> <td>Name _____</td> <td>Classification _____</td> </tr> <tr> <td>• Wetlands:</td> <td>Name <u>Federal Waters, NYS Wetland, Federal Waters, Fe...</u></td> <td>Approximate Size <u>453 acres</u></td> </tr> <tr> <td>• Wetland No. (if regulated by DEC)</td> <td colspan="2"><u>BRE-14, BRE-11</u></td> </tr> </table>		• Streams:	Name <u>899-10</u>	Classification <u>C</u>	• Lakes or Ponds:	Name _____	Classification _____	• Wetlands:	Name <u>Federal Waters, NYS Wetland, Federal Waters, Fe...</u>	Approximate Size <u>453 acres</u>	• Wetland No. (if regulated by DEC)	<u>BRE-14, BRE-11</u>	
• Streams:	Name <u>899-10</u>	Classification <u>C</u>											
• Lakes or Ponds:	Name _____	Classification _____											
• Wetlands:	Name <u>Federal Waters, NYS Wetland, Federal Waters, Fe...</u>	Approximate Size <u>453 acres</u>											
• Wetland No. (if regulated by DEC)	<u>BRE-14, BRE-11</u>												
v. Are any of the above water bodies listed in the most recent compilation of NYS water quality-impaired waterbodies? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span> If yes, name of impaired water body/bodies and basis for listing as impaired: _____													
i. Is the project site in a designated Floodway? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>													
j. Is the project site in the 100-year Floodplain? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>													
k. Is the project site in the 500-year Floodplain? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>													
l. Is the project site located over, or immediately adjoining, a primary, principal or sole source aquifer? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span> If Yes:													
i. Name of aquifer: _____													

m. Identify the predominant wildlife species that occupy or use the project site:		
eastern chipmunk _____ eastern gray squirrel _____ tufted titmouse _____	white-tailed deer _____ wood thrush _____ racoon _____	nuthatch _____ ruffed grouse _____ other common birds & small mammals. _____
n. Does the project site contain a designated significant natural community? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>		
If Yes:		
i. Describe the habitat/community (composition, function, and basis for designation): _____		
ii. Source(s) of description or evaluation: _____		
iii. Extent of community/habitat:		
<ul style="list-style-type: none"> <li>• Currently: _____ acres</li> <li>• Following completion of project as proposed: _____ acres</li> <li>• Gain or loss (indicate + or -): _____ acres</li> </ul>		
o. Does project site contain any species of plant or animal that is listed by the federal government or NYS as endangered or threatened, or does it contain any areas identified as habitat for an endangered or threatened species? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span>		
If Yes:		
i. Species and listing (endangered or threatened): _____		
Sedge Wren, Indiana Bat      Further consultation with NYNHP is needed due to age of the previous studies.		
_____		
p. Does the project site contain any species of plant or animal that is listed by NYS as rare, or as a species of special concern? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>		
If Yes:		
i. Species and listing: Further consultation with NYNHP is needed due to age of the previous studies.		
_____		
q. Is the project site or adjoining area currently used for hunting, trapping, fishing or shell fishing? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>		
If yes, give a brief description of how the proposed action may affect that use: _____		
_____		
<b>E.3. Designated Public Resources On or Near Project Site</b>		
a. Is the project site, or any portion of it, located in a designated agricultural district certified pursuant to Agriculture and Markets Law, Article 25-AA, Section 303 and 304? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>		
If Yes, provide county plus district name/number: _____		
b. Are agricultural lands consisting of highly productive soils present? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span>		
i. If Yes: acreage(s) on project site? Approx. 1/2 of Project site (626 +/-ac) soils are rated as prime farmland or farmland of statewide significance.		
ii. Source(s) of soil rating(s): USDA Web Soil Survey		
c. Does the project site contain all or part of, or is it substantially contiguous to, a registered National Natural Landmark? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>		
If Yes:		
i. Nature of the natural landmark: <input type="checkbox"/> Biological Community <input type="checkbox"/> Geological Feature		
ii. Provide brief description of landmark, including values behind designation and approximate size/extent: _____		
_____		
d. Is the project site located in or does it adjoin a state listed Critical Environmental Area? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>		
If Yes:		
i. CEA name: _____		
ii. Basis for designation: _____		
iii. Designating agency and date: _____		

e. Does the project site contain, or is it substantially contiguous to, a building, archaeological site, or district which is listed on the National or State Register of Historic Places, or that has been determined by the Commissioner of the NYS Office of Parks, Recreation and Historic Preservation to be eligible for listing on the State Register of Historic Places? ☐ Yes ☒ No

If Yes:

i. Nature of historic/archaeological resource: ☐ Archaeological Site ☐ Historic Building or District

ii. Name: \_\_\_\_\_

iii. Brief description of attributes on which listing is based: \_\_\_\_\_

f. Is the project site, or any portion of it, located in or adjacent to an area designated as sensitive for archaeological sites on the NY State Historic Preservation Office (SHPO) archaeological site inventory? ☐ Yes ☒ No

g. Have additional archaeological or historic site(s) or resources been identified on the project site? ☐ Yes ☒ No

If Yes:

i. Describe possible resource(s): \_\_\_\_\_

ii. Basis for identification: \_\_\_\_\_

h. Is the project site within five miles of any officially designated and publicly accessible federal, state, or local scenic or aesthetic resource? ☐ Yes ☒ No

If Yes:

i. Identify resource: \_\_\_\_\_

ii. Nature of, or basis for, designation (e.g., established highway overlook, state or local park, state historic trail or scenic byway, etc.): \_\_\_\_\_

iii. Distance between project and resource: \_\_\_\_\_ miles.

i. Is the project site located within a designated river corridor under the Wild, Scenic and Recreational Rivers Program 6 NYCRR 666? ☐ Yes ☒ No

If Yes:

i. Identify the name of the river and its designation: \_\_\_\_\_

ii. Is the activity consistent with development restrictions contained in 6NYCRR Part 666? ☐ Yes ☐ No

#### F. Additional Information

Attach any additional information which may be needed to clarify your project.

If you have identified any adverse impacts which could be associated with your proposal, please describe those impacts plus any measures which you propose to avoid or minimize them.

#### G. Verification

I certify that the information provided is true to the best of my knowledge.

Applicant/Sponsor Name GCIDA Date 12/8/20

Signature [Signature] Title Executive Director

## **ATTACHMENT**

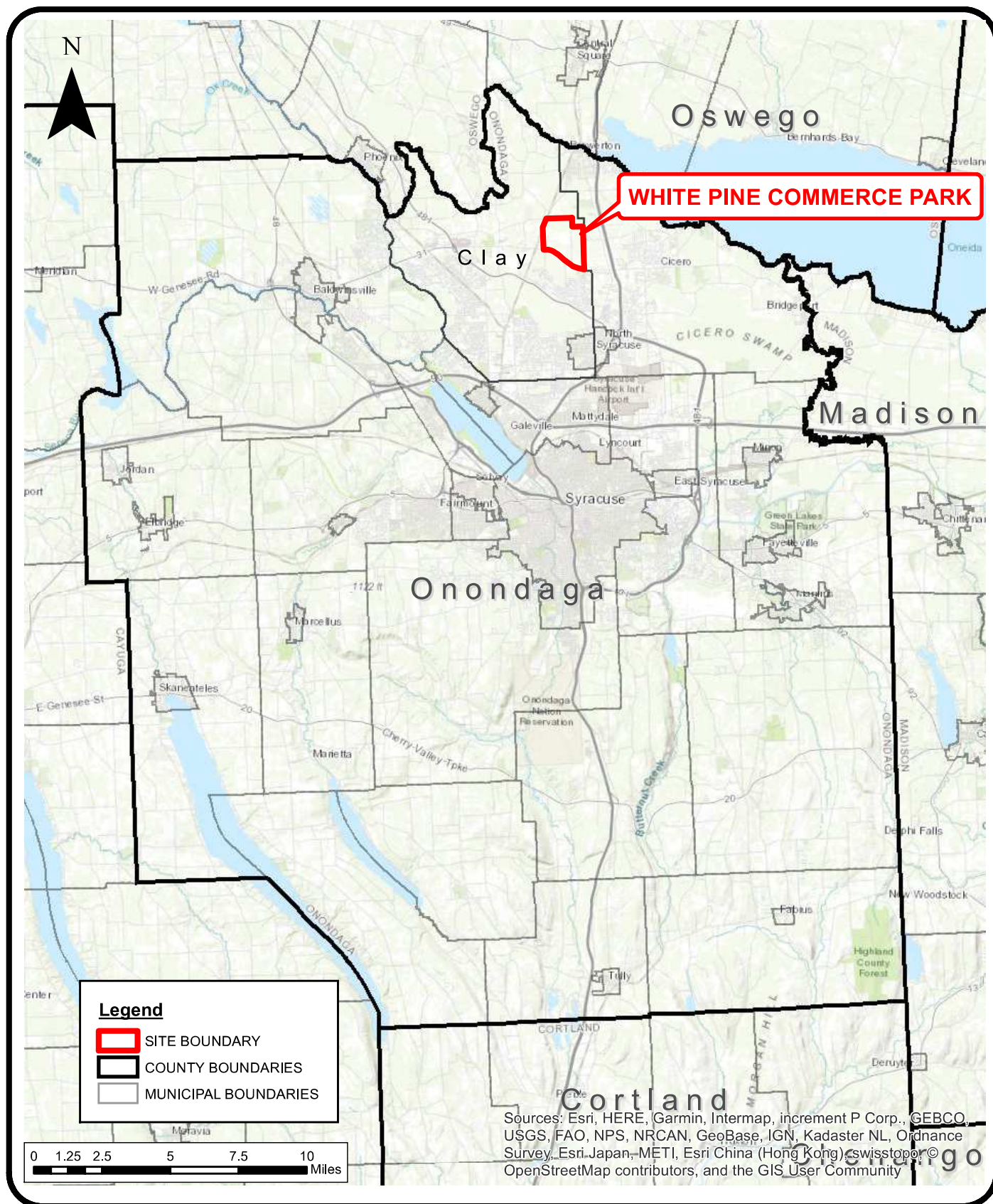
### **WHITE PINE COMMERCE PARK**

#### **SEQRA EAF Part 1.B - Government Approvals, Funding, Sponsorship**

Below is a list of agencies and permits/approvals that are or may be required for the future development of White Pine Commerce Park.

- Onondaga County Department of Transportation (OCDOT) - highway improvement, resignaling, right-of-way work permit, curb cuts
- Onondaga County Department of Health (OCDOH) - sewer design approval
- Onondaga County Department of Water Environment Protection (OCDWEP) - sewer infrastructure
- Onondaga County Metropolitan Water Board- water supply approval
- Onondaga County Industrial Development Agency – eminent domain
- Syracuse Metropolitan Transportation Council (SMTC) - traffic review
- New York State Department of Transportation (NYSDOT) - highway improvement, resignaling
- New York State Department of Environmental Conservation (NYSDEC)- stormwater, SPDES, SPDES General Permit, air, freshwater wetland, endangered species, 401 water quality certification
- New York State Office of Parks, Recreation and Historic Preservation (NYS OPRHP) – historical/archaeological resource review
- United States Army Corps of Engineers (USACE) - wetland permit, Nationwide permit
- United States Fish and Wildlife Service (USFWS) - endangered species
- Town of Clay Town Board – zone change
- Town of Clay – subdivision, site plan
- Town of Clay Zoning Board of Appeals- zoning variance, special permit
- Town of Clay Planning Department- Building permit, inspection and certificate of occupancy, SWPPP approval, MS4 approval
- Syracuse Onondaga County Planning Agency – GML 239-m review





19 British American Blvd., Latham, New York 12110  
P: (518) 782-0882 F: (518) 782-0973 [www.jmt.com](http://www.jmt.com)

REGIONAL MAP  
*OCIDA*

WHITE PINE COMMERCE PARK

TOWNS OF CLAY & CICERO

ONONDAGA CO., NY

PROJ. NO: 20-03861N

DATE: DEC. 2020

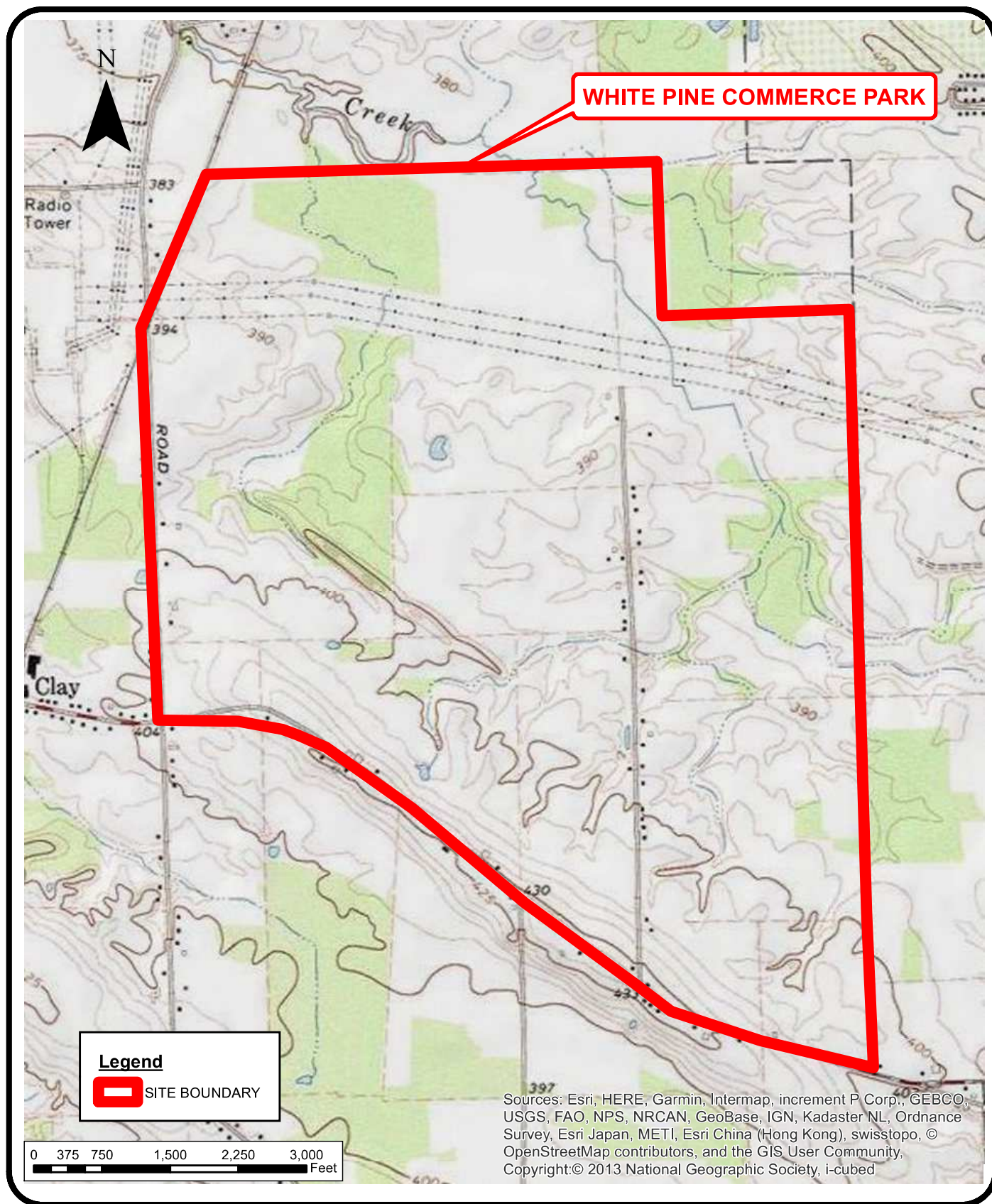
SCALE: 1" = 5 MI

DWG: SLM.MXD

FIGURE:

1





19 British American Blvd., Latham, New York 12110  
P: (518) 782-0882 F: (518) 782-0973 [www.jmt.com](http://www.jmt.com)

SITE LOCATION MAP  
*OCIDA*  
WHITE PINE COMMERCE PARK

TOWNS OF CLAY & CICERO

ONONDAGA CO., NY

PROJ. NO: 20-03861N

DATE: DEC. 2020

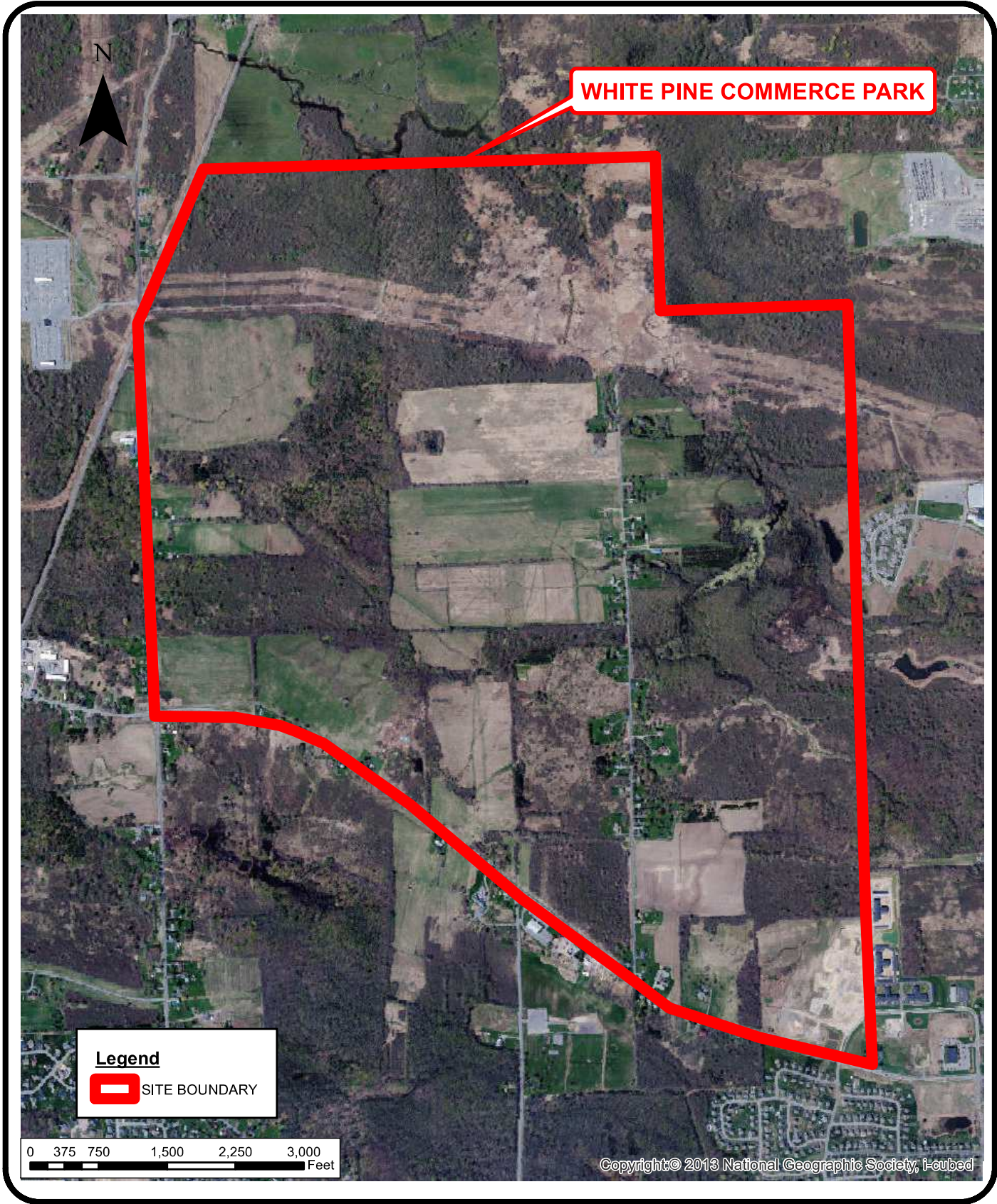
SCALE: 1" = 1,500 FT

DWG: SLM.MXD

FIGURE:

2





19 British American Blvd., Latham, New York 12110  
P: (518) 782-0882 F: (518) 782-0973 [www.jmt.com](http://www.jmt.com)

2018 ORTHOIMAGERY  
OCIDA  
WHITE PINE COMMERCE PARK

TOWNS OF CLAY & CICERO

ONONDAGA CO., NY

PROJ. NO: 20-03861N

DATE: DEC. 2020

SCALE: 1" = 1,500 FT

DWG: ORTHO.MXD

FIGURE:

3

**Full Environmental Assessment Form**  
**Part 2 - Identification of Potential Project Impacts**

Agency Use Only [If applicable]

Project : \_\_\_\_\_

Date : \_\_\_\_\_

**Part 2 is to be completed by the lead agency.** Part 2 is designed to help the lead agency inventory all potential resources that could be affected by a proposed project or action. We recognize that the lead agency's reviewer(s) will not necessarily be environmental professionals. So, the questions are designed to walk a reviewer through the assessment process by providing a series of questions that can be answered using the information found in Part 1. To further assist the lead agency in completing Part 2, the form identifies the most relevant questions in Part 1 that will provide the information needed to answer the Part 2 question. When Part 2 is completed, the lead agency will have identified the relevant environmental areas that may be impacted by the proposed activity.

If the lead agency is a state agency **and** the action is in any Coastal Area, complete the Coastal Assessment Form before proceeding with this assessment.

**Tips for completing Part 2:**

- Review all of the information provided in Part 1.
- Review any application, maps, supporting materials and the Full EAF Workbook.
- Answer each of the 18 questions in Part 2.
- If you answer “**Yes**” to a numbered question, please complete all the questions that follow in that section.
- If you answer “**No**” to a numbered question, move on to the next numbered question.
- Check appropriate column to indicate the anticipated size of the impact.
- Proposed projects that would exceed a numeric threshold contained in a question should result in the reviewing agency checking the box “Moderate to large impact may occur.”
- The reviewer is not expected to be an expert in environmental analysis.
- If you are not sure or undecided about the size of an impact, it may help to review the sub-questions for the general question and consult the workbook.
- When answering a question consider all components of the proposed activity, that is, the “whole action”.
- Consider the possibility for long-term and cumulative impacts as well as direct impacts.
- Answer the question in a reasonable manner considering the scale and context of the project.

<b>1. Impact on Land</b> Proposed action may involve construction on, or physical alteration of, the land surface of the proposed site. (See Part 1. D.1) <i>If “Yes”, answer questions a - j. If “No”, move on to Section 2.</i>				<input type="checkbox"/> NO	<input checked="" type="checkbox"/> YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur		
a. The proposed action may involve construction on land where depth to water table is less than 3 feet.	E2d	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
b. The proposed action may involve construction on slopes of 15% or greater.	E2f	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
c. The proposed action may involve construction on land where bedrock is exposed, or generally within 5 feet of existing ground surface.	E2a	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
d. The proposed action may involve the excavation and removal of more than 1,000 tons of natural material.	D2a	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
e. The proposed action may involve construction that continues for more than one year or in multiple phases.	D1e	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
f. The proposed action may result in increased erosion, whether from physical disturbance or vegetation removal (including from treatment by herbicides).	D2e, D2q	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
g. The proposed action is, or may be, located within a Coastal Erosion hazard area.	B1i	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
h. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>		



**2. Impact on Geological Features**

The proposed action may result in the modification or destruction of, or inhibit access to, any unique or unusual land forms on the site (e.g., cliffs, dunes, minerals, fossils, caves). (See Part 1. E.2.g)

☒ NO☐ YES

*If "Yes", answer questions a - c. If "No", move on to Section 3.*

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. Identify the specific land form(s) attached: _____ _____	E2g	<input type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may affect or is adjacent to a geological feature listed as a registered National Natural Landmark. Specific feature: _____	E3c	<input type="checkbox"/>	<input type="checkbox"/>
c. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>

**3. Impacts on Surface Water**

The proposed action may affect one or more wetlands or other surface water bodies (e.g., streams, rivers, ponds or lakes). (See Part 1. D.2, E.2.h)

☐ NO☒ YES

*If "Yes", answer questions a - l. If "No", move on to Section 4.*

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may create a new water body.	D2b, D1h	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. The proposed action may result in an increase or decrease of over 10% or more than a 10 acre increase or decrease in the surface area of any body of water.	D2b	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. The proposed action may involve dredging more than 100 cubic yards of material from a wetland or water body.	D2a	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. The proposed action may involve construction within or adjoining a freshwater or tidal wetland, or in the bed or banks of any other water body.	E2h	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. The proposed action may create turbidity in a waterbody, either from upland erosion, runoff or by disturbing bottom sediments.	D2a, D2h	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. The proposed action may include construction of one or more intake(s) for withdrawal of water from surface water.	D2c	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. The proposed action may include construction of one or more outfall(s) for discharge of wastewater to surface water(s).	D2d	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. The proposed action may cause soil erosion, or otherwise create a source of stormwater discharge that may lead to siltation or other degradation of receiving water bodies.	D2e	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. The proposed action may affect the water quality of any water bodies within or downstream of the site of the proposed action.	E2h	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. The proposed action may involve the application of pesticides or herbicides in or around any water body.	D2q, E2h	<input checked="" type="checkbox"/>	<input type="checkbox"/>
k. The proposed action may require the construction of new, or expansion of existing, wastewater treatment facilities.	D1a, D2d	<input type="checkbox"/>	<input checked="" type="checkbox"/>

I. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>
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<b>4. Impact on groundwater</b> The proposed action may result in new or additional use of ground water, or may have the potential to introduce contaminants to ground water or an aquifer. (See Part 1. D.2.a, D.2.c, D.2.d, D.2.p, D.2.q, D.2.t) <i>If "Yes", answer questions a - h. If "No", move on to Section 5.</i>			
		<input type="checkbox"/> NO	<input checked="" type="checkbox"/> YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may require new water supply wells, or create additional demand on supplies from existing water supply wells.	D2c	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Water supply demand from the proposed action may exceed safe and sustainable withdrawal capacity rate of the local supply or aquifer. Cite Source: _____	D2c	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may allow or result in residential uses in areas without water and sewer services.	D1a, D2c	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. The proposed action may include or require wastewater discharged to groundwater.	D2d, E2l	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. The proposed action may result in the construction of water supply wells in locations where groundwater is, or is suspected to be, contaminated.	D2c, E1f, E1g, E1h	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. The proposed action may require the bulk storage of petroleum or chemical products over ground water or an aquifer.	D2p, E2l	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. The proposed action may involve the commercial application of pesticides within 100 feet of potable drinking water or irrigation sources.	E2h, D2q, E2l, D2c	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>

<b>5. Impact on Flooding</b> The proposed action may result in development on lands subject to flooding. (See Part 1. E.2) <i>If "Yes", answer questions a - g. If "No", move on to Section 6.</i>			
		<input type="checkbox"/> NO	<input checked="" type="checkbox"/> YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may result in development in a designated floodway.	E2i	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may result in development within a 100 year floodplain.	E2j	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may result in development within a 500 year floodplain.	E2k	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. The proposed action may result in, or require, modification of existing drainage patterns.	D2b, D2e	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. The proposed action may change flood water flows that contribute to flooding.	D2b, E2i, E2j, E2k	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. If there is a dam located on the site of the proposed action, is the dam in need of repair, or upgrade?	E1e	<input checked="" type="checkbox"/>	<input type="checkbox"/>

g. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>
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<b>6. Impacts on Air</b> The proposed action may include a state regulated air emission source. <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES (See Part 1. D.2.f., D.2.h, D.2.g) <span style="float: right;">Although the proposed action will not include a state regulated air emission source, the future build-out of the park may.</span> <i>If "Yes", answer questions a - f. If "No", move on to Section 7.</i>			
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. If the proposed action requires federal or state air emission permits, the action may also emit one or more greenhouse gases at or above the following levels: i. More than 1000 tons/year of carbon dioxide (CO <sub>2</sub> ) ii. More than 3.5 tons/year of nitrous oxide (N <sub>2</sub> O) iii. More than 1000 tons/year of carbon equivalent of perfluorocarbons (PFCs) iv. More than .045 tons/year of sulfur hexafluoride (SF <sub>6</sub> ) v. More than 1000 tons/year of carbon dioxide equivalent of hydrochloroflourocarbons (HFCs) emissions vi. 43 tons/year or more of methane	D2g D2g D2g D2g D2g D2h	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
b. The proposed action may generate 10 tons/year or more of any one designated hazardous air pollutant, or 25 tons/year or more of any combination of such hazardous air pollutants.	D2g	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. The proposed action may require a state air registration, or may produce an emissions rate of total contaminants that may exceed 5 lbs. per hour, or may include a heat source capable of producing more than 10 million BTU's per hour.	D2f, D2g	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. The proposed action may reach 50% of any of the thresholds in "a" through "c", above.	D2g	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. The proposed action may result in the combustion or thermal treatment of more than 1 ton of refuse per hour.	D2s	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>

<b>7. Impact on Plants and Animals</b> The proposed action may result in a loss of flora or fauna. (See Part 1. E.2. m.-q.) <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES <i>If "Yes", answer questions a - j. If "No", move on to Section 8.</i>			
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may cause reduction in population or loss of individuals of any threatened or endangered species, as listed by New York State or the Federal government, that use the site, or are found on, over, or near the site.	E2o	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may result in a reduction or degradation of any habitat used by any rare, threatened or endangered species, as listed by New York State or the federal government.	E2o	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may cause reduction in population, or loss of individuals, of any species of special concern or conservation need, as listed by New York State or the Federal government, that use the site, or are found on, over, or near the site.	E2p	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. The proposed action may result in a reduction or degradation of any habitat used by any species of special concern and conservation need, as listed by New York State or the Federal government.	E2p	<input checked="" type="checkbox"/>	<input type="checkbox"/>



e. The proposed action may diminish the capacity of a registered National Natural Landmark to support the biological community it was established to protect.	E3c	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. The proposed action may result in the removal of, or ground disturbance in, any portion of a designated significant natural community. Source: <u>No significant natural communities are present per NYSDEC EAF Mapper.</u>	E2n	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. The proposed action may substantially interfere with nesting/breeding, foraging, or over-wintering habitat for the predominant species that occupy or use the project site.	E2m	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. The proposed action requires the conversion of more than 10 acres of forest, grassland or any other regionally or locally important habitat. Habitat type & information source: _____ <u>Greater than 10 acres of forest or grassland will be converted per proposed site conditions.</u>	E1b	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Proposed action (commercial, industrial or recreational projects, only) involves use of herbicides or pesticides.	D2q	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>

<b>8. Impact on Agricultural Resources</b> The proposed action may impact agricultural resources. (See Part 1. E.3.a. and b.) <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES <i>If "Yes", answer questions a - h. If "No", move on to Section 9.</i>			
	<b>Relevant Part I Question(s)</b>	<b>No, or small impact may occur</b>	<b>Moderate to large impact may occur</b>
a. The proposed action may impact soil classified within soil group 1 through 4 of the NYS Land Classification System.	E2c, E3b	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. The proposed action may sever, cross or otherwise limit access to agricultural land (includes cropland, hayfields, pasture, vineyard, orchard, etc).	E1a, E1b	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may result in the excavation or compaction of the soil profile of active agricultural land.	E3b	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. The proposed action may irreversibly convert agricultural land to non-agricultural uses, either more than 2.5 acres if located in an Agricultural District, or more than 10 acres if not within an Agricultural District.	E1b, E3a	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. The proposed action may disrupt or prevent installation of an agricultural land management system.	E1 a, E1b	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. The proposed action may result, directly or indirectly, in increased development potential or pressure on farmland.	C2c, C3, D2c, D2d	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. The proposed project is not consistent with the adopted municipal Farmland Protection Plan.	C2c	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Other impacts: _____		<input type="checkbox"/>	<input type="checkbox"/>

<b>9. Impact on Aesthetic Resources</b> The land use of the proposed action are obviously different from, or are in sharp contrast to, current land use patterns between the proposed project and a scenic or aesthetic resource. (Part 1. E.1.a, E.1.b, E.3.h.) <i>If "Yes", answer questions a - g. If "No", go to Section 10.</i>			
		<input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES
	<b>Relevant Part I Question(s)</b>	<b>No, or small impact may occur</b>	<b>Moderate to large impact may occur</b>
a. Proposed action may be visible from any officially designated federal, state, or local scenic or aesthetic resource.	E3h	<input type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may result in the obstruction, elimination or significant screening of one or more officially designated scenic views.	E3h, C2b	<input type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may be visible from publicly accessible vantage points: i. Seasonally (e.g., screened by summer foliage, but visible during other seasons) ii. Year round	E3h	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
d. The situation or activity in which viewers are engaged while viewing the proposed action is: i. Routine travel by residents, including travel to and from work ii. Recreational or tourism based activities	E3h E2q, E1c	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
e. The proposed action may cause a diminishment of the public enjoyment and appreciation of the designated aesthetic resource.	E3h	<input type="checkbox"/>	<input type="checkbox"/>
f. There are similar projects visible within the following distance of the proposed project: 0-1/2 mile 1/2 -3 mile 3-5 mile 5+ mile	D1a, E1a, D1f, D1g	<input type="checkbox"/>	<input type="checkbox"/>
g. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>

<b>10. Impact on Historic and Archeological Resources</b> The proposed action may occur in or adjacent to a historic or archaeological resource. (Part 1. E.3.e, f. and g.) <i>If "Yes", answer questions a - e. If "No", go to Section 11.</i>			
		<input type="checkbox"/> NO	<input checked="" type="checkbox"/> YES
	<b>Relevant Part I Question(s)</b>	<b>No, or small impact may occur</b>	<b>Moderate to large impact may occur</b>
a. The proposed action may occur wholly or partially within, or substantially contiguous to, any buildings, archaeological site or district which is listed on the National or State Register of Historical Places, or that has been determined by the Commissioner of the NYS Office of Parks, Recreation and Historic Preservation to be eligible for listing on the State Register of Historic Places.	E3e	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may occur wholly or partially within, or substantially contiguous to, an area designated as sensitive for archaeological sites on the NY State Historic Preservation Office (SHPO) archaeological site inventory.	E3f	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may occur wholly or partially within, or substantially contiguous to, an archaeological site not included on the NY SHPO inventory. Source: <u>NYS Museum</u>	E3g	<input checked="" type="checkbox"/>	<input type="checkbox"/>

d. Other impacts: There are numerous NYS Museum and SHPO identified archaeological sites located within one mile of the project site and/or potential utility improvements.		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>If any of the above (a-d) are answered "Moderate to large impact may occur", continue with the following questions to help support conclusions in Part 3:</p> <p>e.</p> <p>i. The proposed action may result in the destruction or alteration of all or part of the site or property.</p> <p>ii. The proposed action may result in the alteration of the property's setting or integrity.</p> <p>iii. The proposed action may result in the introduction of visual elements which are out of character with the site or property, or may alter its setting.</p>	<p>E3e, E3g, E3f</p> <p>E3e, E3f, E3g, E1a, E1b</p> <p>E3e, E3f, E3g, E3h, C2, C3</p>	<p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p>	<p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p>

<b>11. Impact on Open Space and Recreation</b> The proposed action may result in a loss of recreational opportunities or a reduction of an open space resource as designated in any adopted municipal open space plan. (See Part 1. C.2.c, E.1.c., E.2.q.) <i>If "Yes", answer questions a - e. If "No", go to Section 12.</i>			
		<input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES
	<b>Relevant Part I Question(s)</b>	<b>No, or small impact may occur</b>	<b>Moderate to large impact may occur</b>
a. The proposed action may result in an impairment of natural functions, or "ecosystem services", provided by an undeveloped area, including but not limited to stormwater storage, nutrient cycling, wildlife habitat.	D2e, E1b E2h, E2m, E2o, E2n, E2p	<input type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may result in the loss of a current or future recreational resource.	C2a, E1c, C2c, E2q	<input type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may eliminate open space or recreational resource in an area with few such resources.	C2a, C2c E1c, E2q	<input type="checkbox"/>	<input type="checkbox"/>
d. The proposed action may result in loss of an area now used informally by the community as an open space resource.	C2c, E1c	<input type="checkbox"/>	<input type="checkbox"/>
e. Other impacts: _____		<input type="checkbox"/>	<input type="checkbox"/>

<b>12. Impact on Critical Environmental Areas</b> The proposed action may be located within or adjacent to a critical environmental area (CEA). (See Part 1. E.3.d) <i>If "Yes", answer questions a - c. If "No", go to Section 13.</i>			
		<input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES
	<b>Relevant Part I Question(s)</b>	<b>No, or small impact may occur</b>	<b>Moderate to large impact may occur</b>
a. The proposed action may result in a reduction in the quantity of the resource or characteristic which was the basis for designation of the CEA.	E3d	<input type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may result in a reduction in the quality of the resource or characteristic which was the basis for designation of the CEA.	E3d	<input type="checkbox"/>	<input type="checkbox"/>
c. Other impacts: _____		<input type="checkbox"/>	<input type="checkbox"/>

**13. Impact on Transportation**

The proposed action may result in a change to existing transportation systems.

☐ NO

☒ YES

(See Part 1. D.2.j)

*If "Yes", answer questions a - f. If "No", go to Section 14.*

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. Projected traffic increase may exceed capacity of existing road network.	D2j	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. The proposed action may result in the construction of paved parking area for 500 or more vehicles.	D2j	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. The proposed action will degrade existing transit access.	D2j	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. The proposed action will degrade existing pedestrian or bicycle accommodations.	D2j	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. The proposed action may alter the present pattern of movement of people or goods.	D2j	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Other impacts: _____		<input type="checkbox"/>	<input type="checkbox"/>

**14. Impact on Energy**

The proposed action may cause an increase in the use of any form of energy.

☐ NO

☒ YES

(See Part 1. D.2.k)

*If "Yes", answer questions a - e. If "No", go to Section 15.*

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action will require a new, or an upgrade to an existing, substation.	D2k	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. The proposed action will require the creation or extension of an energy transmission or supply system to serve more than 50 single or two-family residences or to serve a commercial or industrial use.	D1f, D1q, D2k	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. The proposed action may utilize more than 2,500 MWhrs per year of electricity.	D2k	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. The proposed action may involve heating and/or cooling of more than 100,000 square feet of building area when completed.	D1g	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Other Impacts: _____		<input type="checkbox"/>	<input type="checkbox"/>

**15. Impact on Noise, Odor, and Light**

The proposed action may result in an increase in noise, odors, or outdoor lighting.

☐ NO

☒ YES

(See Part 1. D.2.m., n., and o.)

*If "Yes", answer questions a - f. If "No", go to Section 16.*

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may produce sound above noise levels established by local regulation.	D2m	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. The proposed action may result in blasting within 1,500 feet of any residence, hospital, school, licensed day care center, or nursing home.	D2m, E1d	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. The proposed action may result in routine odors for more than one hour per day.	D2o	<input checked="" type="checkbox"/>	<input type="checkbox"/>

d. The proposed action may result in light shining onto adjoining properties.	D2n	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. The proposed action may result in lighting creating sky-glow brighter than existing area conditions.	D2n, E1a	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>

#### 16. Impact on Human Health

The proposed action may have an impact on human health from exposure to new or existing sources of contaminants. (See Part 1.D.2.q., E.1. d. f. g. and h.)

☐ NO

☒ YES

*If "Yes", answer questions a - m. If "No", go to Section 17.*

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action is located within 1500 feet of a school, hospital, licensed day care center, group home, nursing home or retirement community.	E1d	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. The site of the proposed action is currently undergoing remediation.	E1g, E1h	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. There is a completed emergency spill remediation, or a completed environmental site remediation on, or adjacent to, the site of the proposed action.	E1g, E1h	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. The site of the action is subject to an institutional control limiting the use of the property (e.g., easement or deed restriction).	E1g, E1h	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. The proposed action may affect institutional control measures that were put in place to ensure that the site remains protective of the environment and human health.	E1g, E1h	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. The proposed action has adequate control measures in place to ensure that future generation, treatment and/or disposal of hazardous wastes will be protective of the environment and human health.	D2t	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. The proposed action involves construction or modification of a solid waste management facility.	D2q, E1f	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. The proposed action may result in the unearthing of solid or hazardous waste.	D2q, E1f	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. The proposed action may result in an increase in the rate of disposal, or processing, of solid waste.	D2r, D2s	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. The proposed action may result in excavation or other disturbance within 2000 feet of a site used for the disposal of solid or hazardous waste.	E1f, E1g E1h	<input checked="" type="checkbox"/>	<input type="checkbox"/>
k. The proposed action may result in the migration of explosive gases from a landfill site to adjacent off site structures.	E1f, E1g	<input checked="" type="checkbox"/>	<input type="checkbox"/>
l. The proposed action may result in the release of contaminated leachate from the project site.	D2s, E1f, D2r	<input checked="" type="checkbox"/>	<input type="checkbox"/>
m. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>

<b>17. Consistency with Community Plans</b> The proposed action is not consistent with adopted land use plans. (See Part 1. C.1, C.2. and C.3.) <i>If "Yes", answer questions a - h. If "No", go to Section 18.</i>			
		<input type="checkbox"/> NO	<input checked="" type="checkbox"/> YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action's land use components may be different from, or in sharp contrast to, current surrounding land use pattern(s).	C2, C3, D1a E1a, E1b	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. The proposed action will cause the permanent population of the city, town or village in which the project is located to grow by more than 5%.	C2	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. The proposed action is inconsistent with local land use plans or zoning regulations.	C2, C2, C3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. The proposed action is inconsistent with any County plans, or other regional land use plans.	C2, C2	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. The proposed action may cause a change in the density of development that is not supported by existing infrastructure or is distant from existing infrastructure.	C3, D1c, D1d, D1f, D1d, E1b	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. The proposed action is located in an area characterized by low density development that will require new or expanded public infrastructure.	C4, D2c, D2d D2j	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. The proposed action may induce secondary development impacts (e.g., residential or commercial development not included in the proposed action)	C2a	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Other: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>

<b>18. Consistency with Community Character</b> The proposed project is inconsistent with the existing community character. (See Part 1. C.2, C.3, D.2, E.3) <i>If "Yes", answer questions a - g. If "No", proceed to Part 3.</i>			
		<input type="checkbox"/> NO	<input checked="" type="checkbox"/> YES
	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may replace or eliminate existing facilities, structures, or areas of historic importance to the community.	E3e, E3f, E3g	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. The proposed action may create a demand for additional community services (e.g. schools, police and fire)	C4	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. The proposed action may displace affordable or low-income housing in an area where there is a shortage of such housing.	C2, C3, D1f D1g, E1a	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. The proposed action may interfere with the use or enjoyment of officially recognized or designated public resources.	C2, E3	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. The proposed action is inconsistent with the predominant architectural scale and character.	C2, C3	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Proposed action is inconsistent with the character of the existing natural landscape.	C2, C3 E1a, E1b E2g, E2h	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Other impacts: _____ _____		<input type="checkbox"/>	<input type="checkbox"/>



Project :

Date :

***Full Environmental Assessment Form***  
***Part 3 - Evaluation of the Magnitude and Importance of Project Impacts***  
***and***  
***Determination of Significance***

Part 3 provides the reasons in support of the determination of significance. The lead agency must complete Part 3 for every question in Part 2 where the impact has been identified as potentially moderate to large or where there is a need to explain why a particular element of the proposed action will not, or may, result in a significant adverse environmental impact.

Based on the analysis in Part 3, the lead agency must decide whether to require an environmental impact statement to further assess the proposed action or whether available information is sufficient for the lead agency to conclude that the proposed action will not have a significant adverse environmental impact. By completing the certification on the next page, the lead agency can complete its determination of significance.

**Reasons Supporting This Determination:**

To complete this section:

- Identify the impact based on the Part 2 responses and describe its magnitude. Magnitude considers factors such as severity, size or extent of an impact.
- Assess the importance of the impact. Importance relates to the geographic scope, duration, probability of the impact occurring, number of people affected by the impact and any additional environmental consequences if the impact were to occur.
- The assessment should take into consideration any design element or project changes.
- Repeat this process for each Part 2 question where the impact has been identified as potentially moderate to large or where there is a need to explain why a particular element of the proposed action will not, or may, result in a significant adverse environmental impact.
- Provide the reason(s) why the impact may, or will not, result in a significant adverse environmental impact
- For Conditional Negative Declarations identify the specific condition(s) imposed that will modify the proposed action so that no significant adverse environmental impacts will result.
- Attach additional sheets, as needed.

See the attached Notice of Intent to Serve as Lead Agency and Prepare a Draft Supplemental Generic Environmental Impact Statement for reasons supporting this determination.

**Determination of Significance - Type 1 and Unlisted Actions**

SEQR Status: ☒ Type 1 ☐ Unlisted

Identify portions of EAF completed for this Project: ☒ Part 1 ☒ Part 2 ☒ Part 3

Upon review of the information recorded on this EAF, as noted, plus this additional support information  
Additional information concerning the proposed project.

and considering both the magnitude and importance of each identified potential impact, it is the conclusion of the  
**Onondaga County Industrial Development Agency** as lead agency that:

☐ A. This project will result in no significant adverse impacts on the environment, and, therefore, an environmental impact statement need not be prepared. Accordingly, this negative declaration is issued.

☐ B. Although this project could have a significant adverse impact on the environment, that impact will be avoided or substantially mitigated because of the following conditions which will be required by the lead agency:

There will, therefore, be no significant adverse impacts from the project as conditioned, and, therefore, this conditioned negative declaration is issued. A conditioned negative declaration may be used only for UNLISTED actions (see 6 NYCRR 617.7(d)).

☒ C. This Project may result in one or more significant adverse impacts on the environment, and an environmental impact statement must be prepared to further assess the impact(s) and possible mitigation and to explore alternatives to avoid or reduce those impacts. Accordingly, this positive declaration is issued.

Name of Action: **Proposed White Pine Commerce Park Expansion**

Name of Lead Agency: **Onondaga County Industrial Development Agency**

Name of Responsible Officer in Lead Agency: **Robert Petrovich**

Title of Responsible Officer: **Executive Director**

Signature of Responsible Officer in Lead Agency:



Date: **12/8/20**

Signature of Preparer (if different from Responsible Officer)

Date:

**For Further Information:**

Contact Person: **Robert Petrovich, Onondaga County Industrial Development Agency**

Address: **333 East Washington Street**

Telephone Number: **315-435-3770**

E-mail: **economicdevelopment@ongov.net**

**For Type 1 Actions and Conditioned Negative Declarations, a copy of this Notice is sent to:**

Chief Executive Officer of the political subdivision in which the action will be principally located (e.g., Town / City / Village of)

Other involved agencies (if any)

Applicant (if any)

Environmental Notice Bulletin: <http://www.dec.ny.gov/enb/enb.html>

## EXHIBIT B

**NOTICE OF INTENT TO SERVE AS LEAD AGENCY AND PREPARE A DRAFT  
SUPPLEMENTAL GENERIC ENVIRONMENTAL IMPACT STATEMENT**

**Project: White Pine Commerce Park  
(formerly known as Clay Business Park)**

**5171 Route 31**

**Town of Clay, New York**

**December 8, 2020**

This notice is provided pursuant to the State Environmental Quality Review Act (“SEQRA”), Article 8 of the Environmental Conservation Law and the regulations adopted thereunder at 6 NYCRR Part 617.

The creation of the White Pine Commerce Park was previously determined to be a Type 1 Action under SEQRA and, because the action was found to potentially have a significant impact on the environment, the Onondaga County Industrial Development Agency (“OCIDA”), as lead agency, issued a positive declaration and required the preparation of a Draft Generic Environmental Impact Statement (“DGEIS”). Thereafter, in September 2013, OCIDA issued a Final GEIS (“FGEIS”) for the White Pine Commerce Park and issued its Findings Statement certifying that the requirements of SEQRA had been met and the White Pine Commerce Park was “[c]onsistent with social, economic and other essential considerations from among the reasonable alternatives available, the action is the one that avoids or minimizes adverse environmental impacts to the maximum extent practicable, and that adverse impacts will be avoided or minimized to the maximum extent practicable by incorporating as conditions to the decision those mitigation measures that were identified as practicable[.]”

Project changes are now being proposed to the White Pine Commerce Park and there have been certain changes in circumstances since the 2013 GEIS and Findings Statement. OCIDA has, therefore, determined that it should resume its status as lead agency for the environmental review of these changes to the proposed Action and changed circumstances as described herein and that a Supplemental Generic Environmental Impact Statement will be prepared.

**SEQRA DESIGNATION:** Type 1 Action

**PROJECT DESCRIPTION:** OCIDA, as Project Sponsor, proposes to expand its business park known as the White Pine Commerce Park (“Park”) to approximately 1,253± acres (the “Project” or “Action”). The White Pine Commerce Park is located northeast of the intersection of NYS Route 31 and Caughdenoy Road in the Town of Clay, Onondaga County, New York. OCIDA currently owns approximately 450± acres and would acquire approximately 800± additional acres

to the east of the existing Park. The acreage to be acquired are parcels contiguous to the current Park, and are generally located along Route 31, and along the east and west sides of Burnett Road.

The Project purpose is to enable OCIDA to market the Project to a larger, more diverse mix of potential industrial and commercial developers by making the site more attractive to a broader scope of industries. The expanded Park will be capable of supporting a mix of industrial and/or commercial uses with related office space, advanced state-of-the-art research, large- or small-scale manufacturing, assembly, warehousing, data management, material processing and distribution facilities in a campus-like setting. The expansion will provide an expanded and improved “shovel ready” facility, demonstrating to industrial and commercial prospects that governmental approvals needed for the infrastructure development and construction have already been secured, or can be readily secured within certain thresholds or permit criteria.

### ***Prior SEQRA Review***

In 2012, OCIDA undertook an environmental review of the original Park. As part of the prior environmental review for the Park, on March 6, 2012, OCIDA established itself as the Lead Agency and assumed the responsibilities for conducting the coordinated environmental review. OCIDA determined that the project was a Type 1 action requiring preparation of an Environmental Impact Statement (“EIS”). As specific tenants and uses within the Park were unknown at that time, OCIDA prepared a GEIS to analyze potential environmental impacts of the project. OCIDA coordinated the SEQRA review for the Park with the other involved agencies.

A draft scoping document was prepared and made available for comment. Following a public comment period, OCIDA issued a Final Scoping Document which identified potential impacts and anticipated impacts to be addressed in the GEIS.

A DGEIS was then prepared, subject to public comment, and accepted as complete on September 20, 2012. The DGEIS evaluated the potential impacts of the proposed multi-use industrial park, envisioning a certain setting which included, but was not limited to:

- The Park would encompass a certain footprint, accommodating approximately 2 million sq. ft. of multi-use space without adverse impact.
- The Park would accommodate uses such as manufacturing, research and development, warehousing, assembly, office, warehousing, distribution facilities, associated parking, and other on-site support buildings and structures.
- The Park would maintain greenspace to protect wetlands.
- Anticipated installation of underground utilities and infrastructure for on-site use (i.e. gas and electric utilities, water and sewer infrastructure).
- Off-site improvements such as highway and road improvements, wastewater treatment infrastructure improvements, and water supply infrastructure improvements.
- Tenants would obtain site or facility-specific permits, such as air permits and non-sanitary sewer discharge permits, as necessary for facility-specific operations.

A Public Hearing on the DGEIS was held on October 16, 2012, and the public comment period ended on October 29, 2012. Subsequently, a FGEIS was prepared by OCIDA and accepted as complete on September 10, 2013. The FGEIS incorporated the DGEIS by reference and responded to all substantive comments received on the DGEIS. Both the DGEIS and FGEIS addressed the potential impacts of the envisioned White Pine Commerce Park on environmental resources including: land use and zoning; community character; transportation; utilities and community services; topography, geology and soils; water resources; air resources; ecological resources; cultural and archeological resources; visual and noise resources.

OCIDA thereafter issued its Findings Statement on October 8, 2013. The preferred development scenario from the alternatives evaluated in the DGEIS envisioned a certain development footprint within the Park that avoided construction north of the power lines, with accommodation of approximately 2-2.5 million sq. ft. of industrial development consisting of approximately 46 acres of buildings, approximately 6 acres of support facilities and approximately 58 acres of parking and roads or related infrastructure. The project would encompass or disturb approximately 182 acres, and off-site improvement impacts were evaluated and included road or intersection improvement on Route 31 and Caughdenoy Road, as well as improvements to the sanitary sewer infrastructure.

OCIDA concluded that the action avoided or minimized adverse environmental impacts to the maximum extent practicable, and incorporated mitigation measures that were considered practicable. The Findings Statement also identified certain thresholds for future tenant-specific site use proposals and determined that if there were environmental conditions or impact thresholds that would be exceeded by the proposed tenant-specific use, a supplemental determination of significance or impact evaluation, along with additional mitigation measures beyond those thresholds identified in the DGEIS and FGEIS would be required.

## **REASON FOR POSITIVE DECLARATION AND PREPARATION OF A SUPPLEMENTAL GEIS**

Pursuant 6 N.Y.C.R.R. § 617.9(7)(i), the Project Sponsor finds that a SGEIS is necessary due to changes proposed for the Park that are not adequately addressed in the prior DGEIS and FGEIS, as well as certain changes in circumstances since 2013. Project changes include, but are not limited to, an expansion of the geographic footprint of the Park to approximately 1253 ± acres, physical and/or environmental conditions that will be altered in furtherance of the Action, an expanded scope of potential uses that may be possible at the site, and the potential use by OCIDA of eminent domain, as necessary, to secure the land necessary for the Project.

## **SUMMARY OF POTENTIAL ADVERSE IMPACTS TO BE ADDRESSED IN SUPPLEMENTAL GEIS.**

Potential impacts associated with the proposed action are identified in the Full Environmental Assessment Form. These impacts, which may be reasonably expected to result from the Project, have been compared to the criteria for determining significance identified in 6 N.Y.C.R.R. § 617.7(c)(1) and in accordance with 6 N.Y.C.R.R. § 617.7(c)(2) and (3). The discussion of

potentially significant adverse impacts and mitigation includes the following topics outlined below. For each impact category, appropriate mitigation measures will be identified and evaluated to determine how best to address potential adverse impacts associated with future development.

### ***Zoning and Land Use***

The Park is located in the Town of Clay's Industrial 2 (I-2) zoning district, but the Project includes incorporating lands located in the Residential Agricultural District (RA-100) and one Family Residential (R-15) zoning district. This will require a zone change from the Town of Clay to permit the types of industrial uses necessary for OCIDA to effectively market the expanded Park. The anticipated zoning change will be evaluated in the context of surrounding land use conditions and relevant local plans and laws.

### ***Community Character***

Changes in community character and in local or regional demographics that could result from the Project will be explored. Changes in demographic and socioeconomic conditions resulting from the additional build-out of the site (due to a possible influx of new residents, for example) could have implications on local community services such as schools, police, fire, emergency services as well as taxes, property values, housing, and other community facilities.

### ***Transportation***

Potential impacts on transportation systems and local road networks due to expansion and development of the Park, particularly from increased vehicular traffic along NYS Route 31, will be reviewed. NYS Route 31 through the Towns of Clay and Cicero have experienced rapid development and increased traffic in recent years, and further increases are likely with or without the Project, based on recent corridor studies. The impact on traffic conditions along the NYS Route 31 corridor and intersections will be evaluated for existing, no-build and phased levels of Project build-out. Mitigation measures will be evaluated and will be determined following consultation with the NYSDOT and Onondaga County DOT.

### ***Energy and Utilities***

The FGEIS determined that with the exception of the lack of sanitary sewer and natural gas infrastructure for the Park, other utilities are anticipated to have sufficient capacity and be easily accessed to provide service to the Park. The expanded Project is anticipated to include an electrical substation within the Park. The SGEIS will analyze the available utilities and potential utility demands, and include verification from personal communications or other documentation from service providers regarding the ability of existing utilities to support the Project. Utility service thresholds, limits on capacities, or potential upgrades will be identified based upon information from providers as well as any related potential impacts and necessary mitigation.



### ***Topography, Geology, Soils and Groundwater***

Impacts on natural features found on site, including topography, geologic features, groundwater and soils, will be identified and evaluated, and mitigation measures to avoid significant adverse impacts will be discussed. Subsurface soil, groundwater and bedrock conditions and how they relate to potential development of the site will be discussed based in part on past geotechnical investigations conducted in the former 2013 Project area. Silt/clay soils and shallow groundwater exist in portions of the 2013 Project area. These conditions may extend into the expanded site and could affect the design of building foundations and stormwater control features. In local areas that do not currently have municipal water service, the Project could increase demand on groundwater supplies if new or expanded residential development occurs to accommodate a larger workforce.

The expanded Project encompasses a greater amount of land having agricultural value. The SGEIS will address potential reduction in acreage of prime agricultural land.

### ***Water Resources***

With the expansion of the Project area, the number and size of potentially impacted wetlands and natural water bodies has increased. The expanded site encompasses 17 National Wetland Inventory (NWI) mapped wetlands and two state-regulated wetlands. Classified waterbodies present onsite are tributaries to Oneida River. These surface waters are Class C, and are not considered protected; however, any disturbance would require prior approval from the United States Army Corps of Engineers (USACE) and/or the New York State Department of Environmental Conservation (NYSDEC).

Potential impacts to state and federal wetlands will be identified, and efforts to avoid or minimize the extent of adverse impacts will be discussed with consideration of physical layout alternatives. Mitigation measures associated with the potential loss of wetlands will be established following consultation with the NYSDEC and USACE. It is assumed that any loss of wetlands will be mitigated both on and off-site through wetland restoration, creation, and enhancement. The area north of the existing electric transmission line right-of-way is thought to be a potentially viable area for on-site mitigation given the presence of State regulated wetlands. Other locations will be considered for mitigation.

Potential impacts to water resources include impacts resulting from stormwater runoff. These impacts will be minimized with appropriate erosion and sediment controls during construction and permanent stormwater management features in the final buildout. The SGEIS will discuss soil conservation practices, stockpiling, re-vegetation and other best management practices to protect water quality in streams and wetlands and protect vegetation and natural habitats.

### ***Air Resources***

The expansion of the Project site is intended to accommodate larger and more diverse commercial and industrial uses. The determination of potential adverse impacts on air quality from Project will

depend on the types of industrial uses and emissions generated by tenants. Future tenants will need to obtain specific state and federal air quality permits according to the nature of the operations they conduct. State and federal air permits impose requirements for control devices to meet applicable air quality standards and impose limits on allowable emissions.

The expanded Project is anticipated to accommodate a larger workforce, which will create a larger amount of local vehicular traffic. The potential changes in traffic conditions in the area may have implications for air quality if reduced levels of service at intersections along the NYS Route 31 corridor are projected. Traffic mitigation measures are anticipated to accommodate increased traffic levels. Although improved traffic flow will reduce potential vehicular emissions, mobile source emissions will be assessed and evaluated as appropriate.

### ***Climate Change***

The impacts from greenhouse gas emissions due to construction and potential site uses will be identified and analyzed in light of New York State's recently enacted Climate Leadership and Community Protection Act ("CLCPA"). Potential impacts will be identified, and mitigation measures considered to avoid or minimize the Action's impacts on climate change. The impacts will also be compared against the Onondaga County Climate Action Plan (updated 2017).

### ***Human Health***

Potential human health impacts from the Project will be considered. Potential impacts include dust generation during construction and air emissions during the operational phases of the Project. Sensitive receptors (a nursing home and a preschool) exist within 1500 feet of the expanded Project area. The anticipated increase in manufacturing, assembly and related high-tech industries contemplated under the expanded Project may generate greater volumes of solid waste and potentially hazardous waste. Anticipated waste volumes and regional disposal capacity will be evaluated.

### ***Ecological Resources***

Ecological impacts resulting from the Project are expected to be limited as a result of avoiding significant ecological resources onsite and along the proposed sewer line and road improvement areas to the extent practicable. Nevertheless, impacts from the Project may occur and mitigation necessary to reduce adverse impacts to ecological resources will be described.

As the New York Natural Heritage Program ("NYNHP") recommends a new assessment of a project area after one year from the date of the original findings to account for any new or updated information, it will be necessary to consult with NYNHP and United States Fish and Wildlife Service ("USFWS") to evaluate the potential impacts of the Project on rare, threatened, and endangered species. Consultation with the agencies will identify previously reported species on and in the vicinity of the Project, and determine if additional field investigations may be warranted.

to confirm the presence or absence or current use of potential habitat for identified species. The SGEIS will assess potential Project impacts and identify appropriate mitigation as necessary.

The loss of forest and grasslands are considered irreversible ecological impacts. The larger project footprint increases the acreage of land clearance; thus, creating a larger impact on ecological resources. These impacts will also be considered and discussed in the SGEIS.

### ***Cultural and Archeological Resources***

Project impacts on cultural and archeological resources, including along the proposed sewer line and in areas of potential road improvements will be determined in consultation with NYS Office of Parks, Recreation and Historic Preservation (“OPRHP”) / State Preservation Officer (“SHPO”) 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 SGEIS will identify potential impacts and discuss appropriate mitigation measures. Mitigation may include resource avoidance, documentation, and/or removal.

Consultation with NYS OPRHP / SHPO will also be warranted for concurrence regarding the prior archaeological/cultural resources survey report and if additional investigations and/or studies are deemed necessary.

### ***Visual***

The appearance of the planned development differs from the existing natural landscape of the area. Potential visual impacts associated with the Project will be described in general terms relative to anticipated changes in visual character and views of the site once development occurs. Mitigation alternatives to mitigate potentially adverse visual impacts on receptors and the NYS Route 31 corridor will be addressed according to levels of practicability and screening effectiveness. Impacts and mitigation will consider lighting and the maintenance or establishment of natural or other visual buffers and screening. More specific measures that can be implemented to mitigate specific visual aspects of the Project will be discussed and determined during the Town’s Site Plan review and approval process once specific development is proposed.

### ***Noise, Odor, and Light***

Potential noise impacts associated with the Project will be considered for both construction and operation of industrial uses. Impacts and mitigation measures to reduce adverse impacts on the nearby receptors will be described for both short-term and long-term periods. Best management construction practices to control noise generation will be identified. Mitigation may include recommendations for the location of staging areas, limits on hours of construction activity and establishing a complaint resolution process. The Project will be discussed in terms of compliance with current Town of Clay noise regulations. The nature of noise generated by the Project depends on the types of industrial activities conducted by future tenants. However, estimations of noise

levels, distances to sensitive receptors, and sources of noise based on the current proposed development scenario will be addressed and appropriate mitigation measures discussed.

The SGEIS will address any potential impacts on odor, although there are no anticipated significant impacts on odor at this time.

Site lighting for buildings, roads, parking, and utility areas will comply with Chapter 140 of the Town of Clay Code. Mitigation of potential off-site impacts from lighting will consider the placement of lighting and the types of fixtures to be used as recommended by the Illuminating Engineering Society of North America (IESNA) to reduce the potential for light pollution to the greatest extent practicable.

## **REASONS SUPPORTING THIS LEAD AGENCY DETERMINATION**

OCIDA, as the Project sponsor and the agency most familiar with the Project area and potential future use of the land, has the broadest governmental powers for investigation of the impact of the proposed changes to the Action and the greatest capability for providing a thorough environmental assessment of the Action as presented.

**NOTICE**  
**STATE ENVIRONMENTAL QUALITY REVIEW ACT**  
**LEAD AGENCY DESIGNATION**  
**ONONDAGA COUNTY INDUSTRIAL DEVELOPMENT AGENCY**

**December 9, 2020**

This notice is provided pursuant to the State Environmental Quality Review Act (“SEQRA”), Article 8 of the Environmental Conservation Law and the regulations adopted thereunder at 6 NYCRR Part 617. The Onondaga County Industrial Development Agency (“OCIDA”) intends to assume the role of Lead Agency for the purpose of conducting a coordinated environmental review under SEQRA for the following action .

**Project Name:** Proposed Expansion of the White Pine Commerce Park

**Project Address:** 5171 Route 31, Town of Clay, Onondaga County New York

**Description of Action:** OCIDA, as Project Sponsor, proposes to expand its business park known as White Pine Commerce Park to approximately 1,253± acres (the “Project”). White Pine Commerce Park (the “Park”) is located at the northeast of the intersection of NYS Route 31 and Caughdenoy Road. OCIDA currently owns approximately 450± acres and would acquire approximately 800± additional acres to the east of the existing Park. The expanded Park will be capable of supporting a mix of industrial and/or commercial uses that may include industrially related office, research, manufacturing, assembly, warehousing, data management, material processing and distribution facilities in a campus-like setting.

Based on its review of the Full Environmental Assessment Form (“FEAF”) prepared for the Project, and its knowledge of the Project generally, OCIDA has determined that the Project constitutes a Type I action as defined under SEQRA. As a recipient of this notice, your agency has been identified as one of the potentially involved agencies for the Project. Since the Lead Agency must be designated by agreement among the involved agencies, OCIDA requests your agreement regarding its assumption of the SEQRA Lead Agency role for this project.

**Within 30 days of the date of this notice, please notify OCIDA in writing at the address below of your agreement to OCIDA acting as lead agency and provide any comments or questions you may have concerning the Project. A lead agency consent form is found below.**

Robert Petrovich, Executive Director  
Onondaga County Industrial Development Agency  
333 West Washington St., Suite 130  
Syracuse, New York 13202  
Email: [economicdevelopment@ongov.net](mailto:economicdevelopment@ongov.net)

Phone: (315) 435-3770  
Fax: (315) 435-3669

A complete copy of the FEAF, including OCIDA's Notice of Intent to Prepare a Supplemental Generic Environmental Impact Statement is enclosed herein. If no response is received within the 30 days of the date of this notice, it shall be assumed that your agency has no objection to OCIDA acting as Lead Agency and no specific concerns about the Project.

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**SEQRA LEAD AGENCY DESIGNATION**

**Project: White Pine Commerce Park  
(formerly known as Clay Business Park)**

**5171 Route 31**

**Town of Clay, New York**

The undersigned, on behalf of \_\_\_\_\_,  
concurs with the designation of the Onondaga County Industrial Development Agency as lead  
agency for the coordinated environmental review of the White Pine Commerce Park Expansion  
Project.

By: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_



**Mailing List:**

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

Edward Wisnowski, Chairman  
Town of Clay Zoning Board of Appeals  
4401 State Route 31  
Clay, NY 13041

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

Matthew Marko, Regional Director  
New York State Department of Environmental Conservation  
615 Erie Boulevard West  
Syracuse, New York 13204-2400

Basil Seggos, Commissioner  
New York State Department of Environmental Conservation  
625 Broadway  
Albany, NY 12233

Martin E. Voss, Commissioner  
Onondaga County Department of Transportation  
John H. Mulroy Civic Center  
421 Montgomery Street, 11th Floor  
Syracuse, New York 13202

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

Dan Kwasnowski, Planning Director  
Syracuse-Onondaga County Planning Agency  
John H. Mulroy Civic Center  
421 Montgomery Street, 11th Floor  
Syracuse, New York 13202

Frank M. Mento, P.E., Commissioner  
Onondaga County Water Environment Protection  
650 Hiawatha Boulevard  
Syracuse, New York 13204

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

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

New York State Office of Parks, Recreation  
& Historic Preservation  
Erik Kulleseid, Commissioner  
625 Broadway  
Albany NY 12207

Onondaga County Metropolitan Water Board  
Terence Mannion, Esq., Acting Chairman  
4170 Route 31  
Clay, NY 13041-8739

U.S. Army Corps of Engineers  
Lt. Col. Eli Adams, Commander  
Buffalo District  
1776 Niagara Street  
Buffalo, NY 14207

U.S. Fish & Wildlife Service  
New York Field Office  
3817 Luker Road  
Cortland, NY 13045

U.S. Fish & Wildlife Service  
Northeast Region  
300 Westgate Center Dr.  
Hadley, MA 01035

Indu Gupta, M.D., MPH  
Commissioner of Health  
Onondaga County Department of Health  
Bureau of Public Health Engineering  
421 Montgomery Street, 12th Floor  
Syracuse, NY 13202

James D'Agostino, Director  
Syracuse Metropolitan Transportation Council  
126 North Salina Street  
100 Clinton Square, Suite 100

**December 9, 2020**

**Mailing List:**

Bill Meyer, Supervisor  
Town of Cicero  
8236 Brewerton Road  
Cicero, NY 13039



200 Northern Concourse  
PO Box 4949  
Syracuse, NY 13221-4949

**Central New York's Water Authority**  
[www.ocwa.org](http://www.ocwa.org)

**Phone: 315-455-7061**  
**Fax: 315-455-6649**

December 16, 2020

Robert Petrovich, Executive Director  
Onondaga County Industrial Development Agency  
333 West Washington Street, Suite 130  
Syracuse, New York 13202

**Subject:** White Pine Commerce Park  
SEQRA Lead Agency Designation


Dear Mr. Petrovich:

OCWA's concurrence with designating the Onondaga County Industrial Development Agency as the lead agency for the coordinated environmental review of the White Pine Commerce Park Expansion Project is attached.

One item of note, since January 1, 2017, OCWA has assumed the operation, maintenance and capital improvements related to the Onondaga County Metropolitan Water Agency. Accordingly, water related inquiries and requests should be directed to OCWA.

Should you have any questions or require information related to water service for the White Pine Commerce Park or OCWA in general, please don't hesitate to contact me directly. My office phone number is 315-455-7061 extension 3114 and my email address is [mehooker@ocwa.org](mailto:mehooker@ocwa.org).

Thank you,

  
Michael E. Hooker  
Executive Director

cc: Geoffrey G. Miller, P.E., BCEE,  
Deputy Executive Director/COO

Phone: (315) 435-3770

Fax: (315) 435-3669

A complete copy of the FEAF, including OCIDA's Notice of Intent to Prepare a Supplemental Generic Environmental Impact Statement is enclosed herein. If no response is received within the 30 days of the date of this notice, it shall be assumed that your agency has no objection to OCIDA acting as Lead Agency and no specific concerns about the Project.

---

**SEQRA LEAD AGENCY DESIGNATION**

**Project: White Pine Commerce Park  
(formerly known as Clay Business Park)**

**5171 Route 31**

**Town of Clay, New York**

The undersigned, on behalf of \_\_\_\_\_ the Onondaga County Water Authority \_\_\_\_\_, concurs with the designation of the Onondaga County Industrial Development Agency as lead agency for the coordinated environmental review of the White Pine Commerce Park Expansion Project.

By:  \_\_\_\_\_

Title: Executive Director

Date: December 16, 2020



# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

## Division of Environmental Permits, Region 7

615 Erie Boulevard West, Syracuse, NY 13204-2400

P: (315) 426-7438 | F: (315) 426-7425

[www.dec.ny.gov](http://www.dec.ny.gov)

Onondaga County Industrial Development Agency  
333 West Washington St., Suite 130  
Syracuse, NY 13202  
[economicdevelopment@ongov.net](mailto:economicdevelopment@ongov.net)

March 5, 2021

**RE: White Pine Commerce Park, Response to SEQRA Lead Agency Coordination  
5171 Route 31, Town of Clay, Onondaga County**

Dear Mr. Petrovich:

The New York State Department of Environmental Conservation (DEC) received the submitted information for the above referenced project on January 8, 2021. This information was received by the Department on January 8, 2021. According to the provided materials, OCIDA, as the project sponsor, proposes to expand its existing 450 acres business park to approximately 1,253 acres to support a mix of industrial and/or commercial businesses. DEC has no objections to OCIDA continuing as lead agency and offers the following to be considered in addition to the impacts that were identified in the 2013 Final Generic Environmental Impact Statement.

### **PROTECTION OF WATERS**

Eight tributaries of Oneida River and Youngs Creek (NYS Water Index#: ONT-66-11-14-4-1A, ONT-66-11-14-2-1, ONT-66-11-14-1C, ONT-66-11-14-2, ONT-66-11-14-1B, ONT-66-11-14, ONT-66-11-14-4, ONT-66-11-14-4-1), all Class C streams, are located within close proximity to the identified project location. These natural resources should be preserved to the best extent possible. An Article 15, Protection of Waters, is required for excavating or placing fill in navigable waters of the state, below the mean high water level, including adjacent and contiguous marshes and wetlands. In New York State, applicants for a Federal license or permit for activities that may result in a discharge into waters of the United States are required to apply for and obtain a Water Quality Certification (WQC) from DEC indicating that the proposed activity will comply with New York State water quality standards. A WQC from DEC is most commonly required when a project also requires a permit from the U.S. Army Corps of Engineers under Section 404 of the Clean Water Act for the placement of fill in waters of the United States. Therefore, any of these impacts should be considered in your environmental review and incorporated into the design. Upon application to DEC, the project sponsor must provide a full delineation of all streams, and should include, but not limited to; stream width at Ordinary High Water Level (OHWL), colored photographs, a determination of its' navigability, any proposed tree cutting along the stream corridor, and any fill or ground disturbance within 50 feet from OHWL.

The project sponsor will be responsible for ensuring that any work shall not pollute any stream or waterbody, as it pertains to New York State's water quality standards program, which includes federal (U.S. EPA) oversight. Care shall be taken to stabilize any disturbed areas promptly after any construction, and all necessary precautions shall be taken to prevent contamination of the stream or waterbody by silt, sediment, fuels, solvents, lubricants, or any other pollutant associated with the project.

### **FRESHWATER WETLANDS**

Your project/site is near or within two Regulated Freshwater Wetlands; BRE-11, a Class III wetland, and BRE-14, a Class II Wetland. Under the Freshwater Wetlands Act, DEC regulates activities in freshwater wetlands and in their 100 foot adjacent areas. DEC regulates such activities to prevent impairment of wetland benefits and functions. Therefore, DEC recommends that any impacts to both the Freshwater



Department of  
Environmental  
Conservation

Wetland and/or 100 foot adjacent area be considered in your environmental review, and strict avoidance incorporated into your design. In addition, a full delineation, and wetland report should be completed. Once completed, please contact our Bureau of Ecosystem Health, to have the delineation verified, at (607) 753-3095, ext. 206.

Please also contact your town officials and the United States Army Corps of Engineers Auburn Field Office, at (315) 255-8090, for anything they might require.

### **STATE-LISTED SPECIES**

DEC has reviewed the State's Natural Heritage records. We have determined that the site is located within or near record(s) for the following State-listed species: Sedge Wren (*Cistothorus platensis*), Threatened, and Indiana Bat (*Myotis sodalis*), Endangered. Please be aware, pursuant to Article 11, Title 5, Section 535 of the Environmental Conservation Law, Threatened and Endangered Species, an "Incidental Take" Permit may be required from the DEC for any project if it is determined that a take of a threatened or endangered species will occur. Regarding the Sedge Wren, DEC will require that a grassland breeding bird survey be conducted. DEC will review the results of this survey in order to determine the need for an incidental take permit. Regarding the Indiana Bat, to avoid adverse impacts, 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. For more information on avoiding impacts to state-listed species referenced above, please contact Tom Bell with DEC's Region 7 Division of Wildlife at (607) 753-3095, ext. 243.

The absence of data does not necessarily mean that rare or state-listed species, natural communities or other significant habitats do not exist on or adjacent to the proposed site. Rather, our files currently do not contain information which indicates their presence. For most sites, comprehensive field surveys have not been conducted. We cannot provide a definitive statement on the presence or absence of all rare or state-listed species or significant natural communities. Depending on the nature of the project and the conditions at the project site, further information from on-site surveys or other sources may be required to fully assess impacts on biological resources.

### **CULTURAL RESOURCES**

We have reviewed the statewide inventory of archaeological resources maintained by the New York State Museum and the New York State Office of Parks, Recreation, and Historic Preservation. These records indicate that the project is not located within an area considered to be sensitive with regard to archaeological resources. For more information, please visit the New York State Office of Historic Preservation website at <http://www.nysparks.com/shpo/>.

Other permits from this Department or other agencies may be required for projects conducted on this property now or in the future. Applicants proposing complex, multi-residential, commercial or industrial projects are strongly encouraged to schedule a pre-application conference. This meeting with DEC allows the applicant to clarify project objectives and obtain DEC's recommendations. Such feedback can improve the project environmentally and shorten the application procedure. Also, regulations applicable to the location subject to this determination occasionally are revised and you should, therefore, verify the need for permits if your project is delayed or postponed. Applications may be downloaded from our website at <https://www.dec.ny.gov/permits/6222.html>.

### **State Pollutant Discharge Elimination System (SPDES)**

If the project will disturb greater than one acre of soil, a SPDES General Permit for Stormwater Discharges from Construction Activity, Permit No. GP-0-20-001 (Stormwater Permit) will be required. The project is located within the Town of Clay, which is a regulated Municipal Separate Storm Sewer System (MS4) community. Therefore, the Stormwater Pollution Prevention Plan (SWPPP) must be reviewed and accepted by the MS4 prior to obtaining stormwater permit coverage. In addition to the MS4 review, DEC

retains its authority to complete a SWPPP review of the project. Please notify DEC when the SWPPP for this project has been completed and is available for review.

The proposed commerce park will most likely be serviced by the Oak Orchard Wastewater Treatment plant (WWTP). Depending on the estimated organic loads the facility (s) will produce, a pretreatment system should be considered. Many industrial developments typically have higher levels of total suspended solids and/or metals, and existing conditions at the treatment plant may not accommodate these increases. In addition to pretreatment, an upgrade to the WWTP should be considered to handle not only the increase in organic loads, but the increase in hydraulic loading.

Proposed new outfalls were mentioned in the FEAF. Once available, DEC will need to review any new outfalls, as any discharges of wastewater will require a SPDES permit, and proper justification as to why the discharges cannot be sent to the Oak Orchard WWTP.

With regards to any proposed sewer extensions, DEC strongly recommends being a co-reviewer along with Onondaga County Department of Health for any and all approvals for the installation of the force mains. Lastly, the groundwater elevation has been noted as 3 feet, and thus any dewatering action should be reviewed by DEC.

**These determinations are typically good for one year, therefore as plans progress please contact DEC to ensure your compliance with Environmental Conservation Law (ECL).** Please contact this office if you have questions regarding the above information. Thank you.

Sincerely,



Trender Choe  
Division of Environmental Permits, Region 7  
Telephone No. (315) 426-7445

Cc: Matthew Marko – R7 Director  
T. Vigneault, V. Ellis, M. Kazmierski – R7 DOW  
T. Bell – R7 Wildlife  
T. Toukatly – R7 BEH  
E. Tracy – R7 RPA  
Town Supervisor

**From:** [dec.sm.NaturalHeritage](mailto:dec.sm.NaturalHeritage)  
**To:** [Carroll, Alexandra](#)  
**Subject:** [EXTERNAL] RE: Info Request  
**Date:** Tuesday, March 30, 2021 5:22:44 PM

---

I see. We can review the project site, but it's worth mentioning that for listed animals such as sedge wren and Indiana bat, we cannot divulge detailed information. We can report the distance from the project site and whether or not it is a breeding or nonbreeding location (for birds) and summer or winter location (for bats). And, you would still need to follow up with NYSDEC Regional Permits staff for additional guidance or permit considerations for any listed species.

We do provide more detailed information for unlisted species and significant natural communities, should there happen to be any.

I will keep this request in our queue for review.

Sincerely,  
Heidi

---

**From:** Carroll, Alexandra <ACarroll@jmt.com>  
**Sent:** Tuesday, March 30, 2021 5:06 PM  
**To:** dec.sm.NaturalHeritage <NaturalHeritage@dec.ny.gov>  
**Subject:** RE: Info Request

Heidi,

Thank you for your email. I did use the EAF Mapper tool and USFWS IPaC tool and found that the project location could impact two species: Sedge wren and Indiana bat. I was hoping to gain more information on the *known occurrences* of these species as neither tool provides that information.

Thanks again,  
Alexandra

JMT of New York, Inc.  
An Employee-Owned Company

Alexandra Carroll, GISP  
Associate  
Special Projects  
D. (518) 218-5925

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**From:** dec.sm.NaturalHeritage <[NaturalHeritage@dec.ny.gov](mailto:NaturalHeritage@dec.ny.gov)>  
**Sent:** Tuesday, March 30, 2021 4:25 PM

**To:** Carroll, Alexandra <[ACarroll@jmt.com](mailto:ACarroll@jmt.com)>

**Subject:** [EXTERNAL] RE: Info Request

Alexandra,

Thank you for contacting the NY Natural Heritage Program.

In your request you mention SEQR review. You can use the [EAF Mapper](#), a NYSDEC online tool, to obtain the information you need. The EAF Mapper is the most efficient way to obtain answers to questions on the EAF. The EAF Mapper will automatically answer many of the EAF questions, including those regarding rare and endangered species (the tool provides specific species names) and significant natural communities. And when you use the EAF Mapper to fill in your EAF, submitting a project screening request to NY Natural Heritage is not necessary.

Due to the volume of requests we are receiving, our turn-around time is currently longer than usual, at about 5-6 weeks response time from submission date. If you use the EAF Mapper in the meantime and are able to get what you need regarding rare and endangered species and significant natural communities, please let me know and I will remove this request from our queue.

Sincerely,

***Heidi Krahling, Environmental Review Specialist***

(she/her)

NY Natural Heritage Program

625 Broadway, 5th Floor

Albany, NY 12233-4757

[www.nynhp.org](http://www.nynhp.org)

---

**From:** Carroll, Alexandra <[ACarroll@jmt.com](mailto:ACarroll@jmt.com)>

**Sent:** Friday, March 26, 2021 2:39 PM

**To:** dec.sm.NaturalHeritage <[NaturalHeritage@dec.ny.gov](mailto:NaturalHeritage@dec.ny.gov)>

**Subject:** Info Request

**Importance:** High

Dear Information Services:

JMT of New York, Inc. is preparing SEQR-related documents for a Draft Generic Environmental Impact Statement (DGEIS) for a proposed manufacturing site bound by NY-31 to the south and Caughdenoy Road to the west in Towns of Clay and Cicero, Onondaga County, New York.

The attached Site Location Map depicts the project boundaries.

Please review the project area for the presence of endangered, threatened, or special concern wildlife species, rare plant, animal or natural community occurrences, or other significant habitats.

If you should have any questions or require additional information, please contact me at [acarroll@jmt.com](mailto:acarroll@jmt.com) or (518) 218-5925.

Kind regards,  
Alexandra

JMT of New York, Inc.  
An Employee-Owned Company

Alexandra Carroll, GISP  
Associate  
Special Projects

19 British American Boulevard  
Latham, New York 12110  
D. (518) 218-5925  
[acarroll@jmt.com](mailto:acarroll@jmt.com)



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JMT 50th Anniversary



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Thank You.



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
New York Ecological Services Field Office

3817 Luker Road

Cortland, NY 13045-9385

Phone: (607) 753-9334 Fax: (607) 753-9699

<http://www.fws.gov/northeast/nyfo/es/section7.htm>



In Reply Refer To:

April 13, 2021

Consultation Code: 05E1NY00-2021-SLI-2254

Event Code: 05E1NY00-2021-E-07085

Project Name: White Pine SGEIS

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

### To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 *et seq.*). This list can also be used to determine whether listed species may be present for projects without federal agency involvement. New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list.

Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the ESA, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC site at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list. If listed, proposed, or candidate species were identified as potentially occurring in the project area, coordination with our office is encouraged. Information on the steps involved with assessing potential impacts from projects can be found at: <http://www.fws.gov/northeast/nyfo/es/section7.htm>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan ([http://www.fws.gov/windenergy/eagle\\_guidance.html](http://www.fws.gov/windenergy/eagle_guidance.html)). Additionally, wind energy projects should follow the Services wind



energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the ESA. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

## Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**New York Ecological Services Field Office**

3817 Luker Road

Cortland, NY 13045-9385

(607) 753-9334

---

## Project Summary

Consultation Code: 05E1NY00-2021-SLI-2254

Event Code: 05E1NY00-2021-E-07085

Project Name: White Pine SGEIS

Project Type: DEVELOPMENT

Project Description: Development of Supplemental Generic Environmental Impact Statement

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@43.188826750000004,-76.15214390820285,14z>



Counties: Onondaga County, New York

## Endangered Species Act Species

There is a total of 2 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

- 
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

## Mammals

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i>	Endangered
There is <b>final</b> critical habitat for this species. The location of the critical habitat is not available. Species profile: <a href="https://ecos.fws.gov/ecp/species/5949">https://ecos.fws.gov/ecp/species/5949</a>	

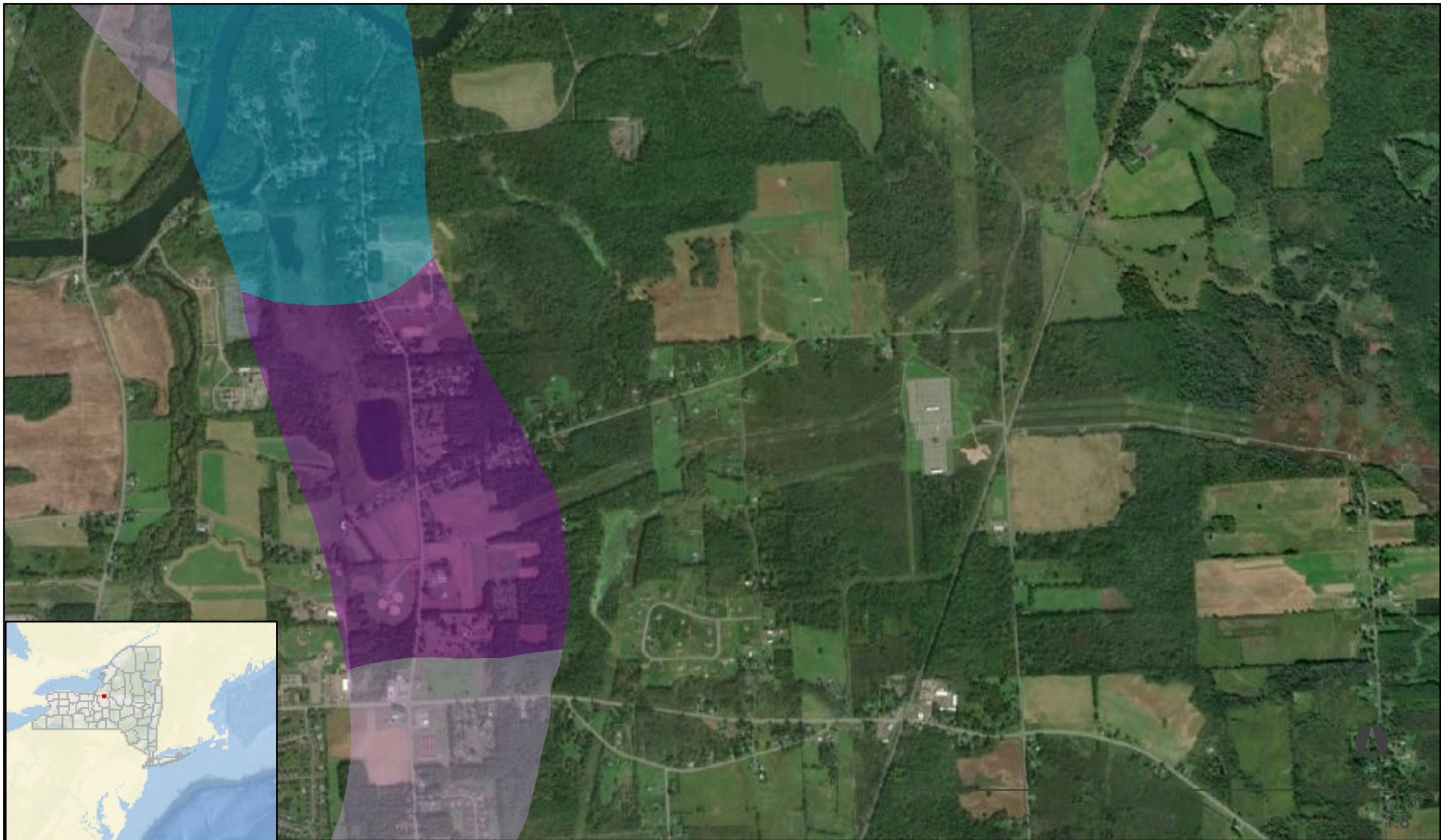
## Reptiles

NAME	STATUS
Eastern Massasauga (=rattlesnake) <i>Sistrurus catenatus</i>	Threatened
No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/2202">https://ecos.fws.gov/ecp/species/2202</a>	

## Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

---



<all other values>



Unconfined, High Yield



Confined, No Overlying Surficial Aquifer



Kame, Outwash or Alluvium



Primary Aquifer Region



Unconfined, Mid Yield



Confined, Unknown Depth and Thickness



Moraine

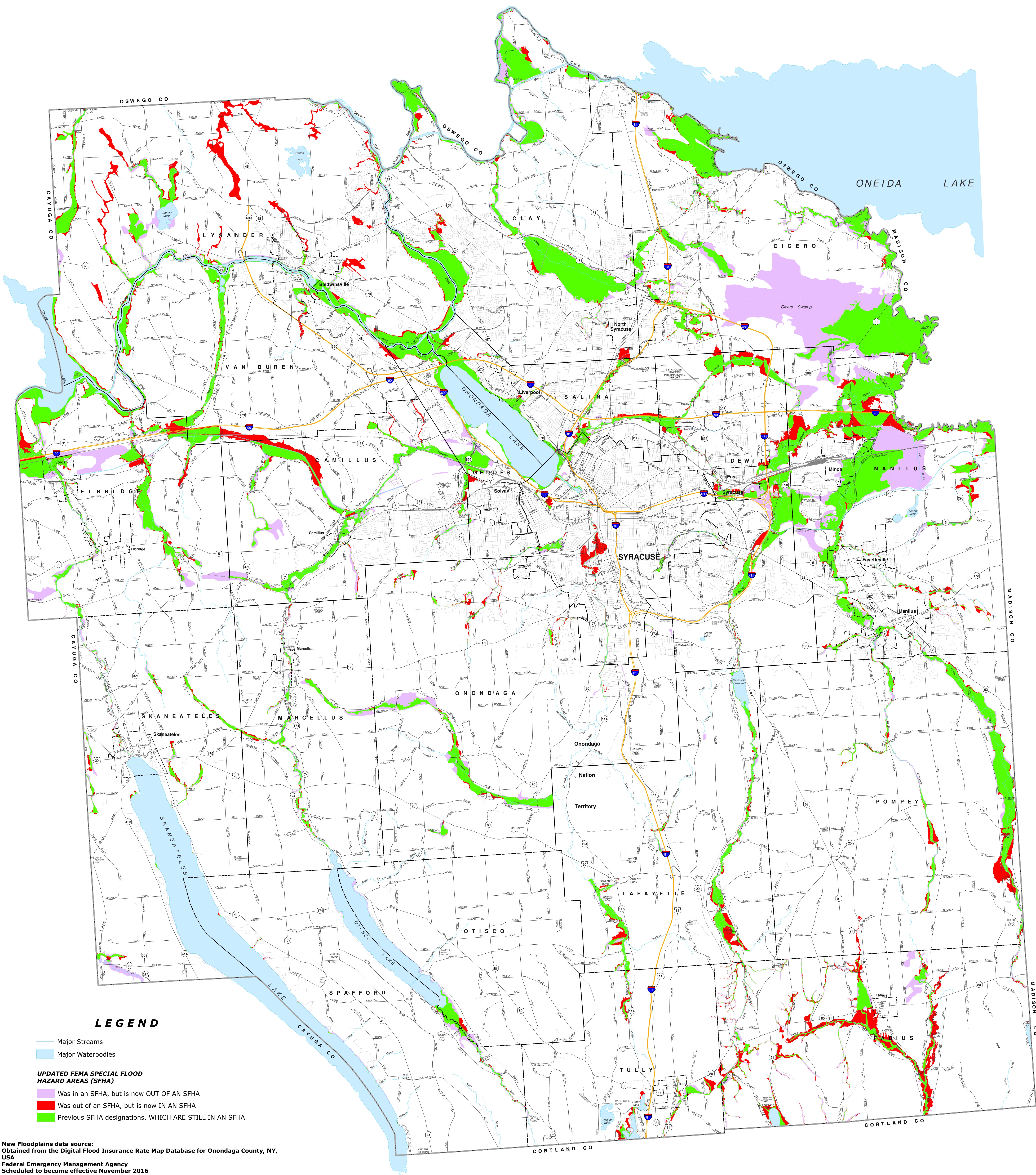


**Department  
of State**

The New York Department of State (DOS) gives no warranty, expressed or implied, as to the accuracy, reliability, or completeness of data shown on this map product. DOS does not assume responsibility for the use or application of any information represented on this map nor responsibility for any error, omission or other discrepancy between the electronic and printed versions of documents.



# FEMA Floodplain Changes in Onondaga County (2016)



New Floodplains data source:  
Obtained from the Digital Flood Insurance Rate Map Database for Onondaga County, NY,  
USA  
Federal Emergency Management Agency  
Scheduled to become effective November 2016

Previous Floodplain data source:  
Provided by the Federal Emergency Management Agency from Flood Insurance Maps  
June 1982 - August 1984

Disclaimer:  
THIS IS NOT AN OFFICIAL FEMA MAP.  
This map is intended for general planning purposes only. It should not be used to determine if a  
property is located in a SFHA. To determine if a property is located in a SFHA, refer to the  
FEMA Flood Insurance Rate Maps.

The hardcopy FIRM and the accompanying FISs are the official designation of SFHAs and Base  
Flood Elevations (BFEs) for the NFIP. For the purposes of the NFIP, changes to the flood risk  
information published by FEMA may only be performed by FEMA and through the mechanisms  
established in the NFIP regulation (44 CFR Parts 59-78). These digital data are produced in  
conjunction with the hardcopy FIRMs and generally match the hardcopy map exactly. However  
the hardcopy flood maps and flood profiles are the authoritative documents for the NFIP.

0 1 2 3 4 5 Miles

NOTE: This map was created by the Syracuse-Onondaga County  
Planning Agency (SOCPA) GIS division using existing (1980's) and  
preliminary (2016) FEMA floodplain data.



20-03861-001 - Project Eagle - T... Prelim Supplement Scope.docx Flood Maps | FEMA.gov FEMA Flood Map Service Center City of Syracuse - Onondaga Co...  
Not secure | fsihost.com/onondaga/Default.aspx  
Apps JMT Intranet New Tab NYSDC SPDES Dat... SharePoint Google New York OPD Geo... Mining Services - PL... Species By County... Other bookmarks  
Home | Metadata | Help

# SYRACUSE - ONONDAGA COUNTY G.I.S. ON THE WEB

J. RYAN McMAHON, II, COUNTY EXECUTIVE BEN WALSH, MAYOR

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Basemaps	Legend	Layers
<input type="checkbox"/> County Sanitary District		
<input type="checkbox"/> School Districts		
<input type="checkbox"/> NYS Assembly Districts		
<input type="checkbox"/> NYS Senate Districts		
<input type="checkbox"/> Syracuse Common Council Districts		
<input type="checkbox"/> Syracuse Wards		
<input checked="" type="checkbox"/> Natural Resources		
<input checked="" type="checkbox"/> Floodplains		
<input type="checkbox"/> Parks		
<input type="checkbox"/> Soils		
<input type="checkbox"/> DEC Wetlands		
<input type="checkbox"/> Federal Wetlands		
<input checked="" type="checkbox"/> County Maintained Wastewater Infrastructure		

Address Search  
Parcel Search  
Measure  
Go To  
Feature Select  
Print

Initial Extent Zoom In Zoom Out Street View Pictometry Identify Selected Tool: None 1:72,224

Environmental Qu...pdf Show all X

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No floodplains identified.



20-03861 - White Pine Develop... x 20-03861 - White Pine Develop... x Question 3 - Impacts on Surface x Environmental Resource Mapper x +

gisservices.dec.ny.gov/gis/erm/

Apps JMT Intranet New Tab NYSDC SPDES Dat... SharePoint Google New York OPD Geo... Mining Services - PL... Species By County... Other bookmarks

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NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

### Environmental Resource Mapper

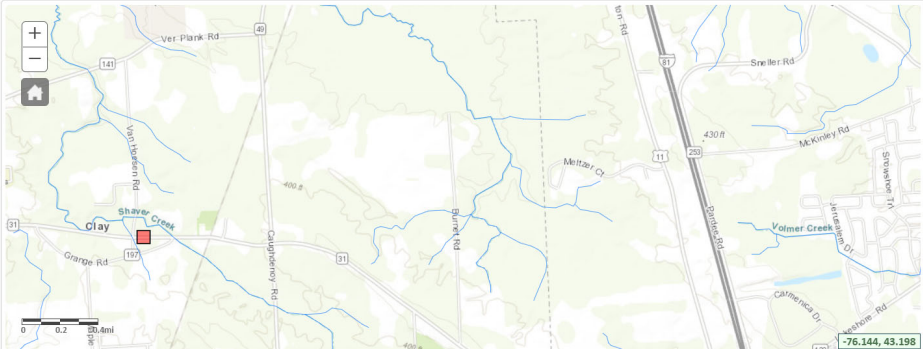
Base Map: Topographical Using this map

Search

Tools

Layers and Legend

- ☐ All Layers
- ☐ Unique Geological Features
- ☒ Waterbody Classifications for Rivers/Streams
- ☐ Waterbody Classifications for Lakes
- Other Wetland Layers
- Reference Layers
- Tell Me More...
- Need A Permit?
- Contacts



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gisservices.dec.ny.gov/gis/erm/

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### Environmental Resource Mapper

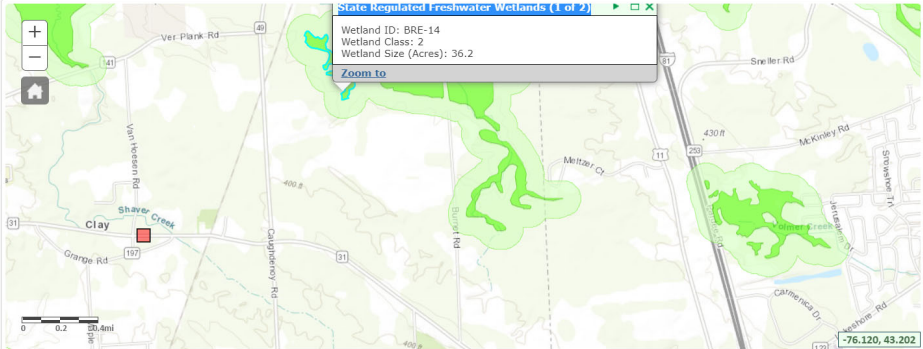
Base Map: Topographical Using this map

Search

Tools

Layers and Legend

- ☒ State Regulated Freshwater Wetlands (Outside of the Adirondack Park)
- ☐ State Regulated Wetland Checkzone
- ☐ Significant Natural Communities
- ☐ Natural Communities Near This Location
- Other Wetland Layers
- Reference Layers
- Tell Me More...
- Need A Permit?
- Contacts



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20-03861 - White Pine Develop... | 20-03861 - White Pine Develop... | Question 3 - Impacts on Surface | Environmental Resource Mapper

giservices.dec.ny.gov/gis/erm/

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NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

## Environmental Resource Mapper

Base Map: Topographical | Using this map

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Tools

**Layers and Legend**

- ☒ State Regulated Freshwater Wetlands (Outside of the Adirondack Park)
- ☐ State Regulated Wetland Checkzone
- ☐ Significant Natural Communities
- ☐ Natural Communities Near This Location

Other Wetland Layers

Reference Layers

Tell Me More...

Need A Permit?

Contacts

State Regulated Freshwater Wetlands (1 of 2)

Wetland ID: BRE-11

Wetland Class: 3

Wetland Size (Acres): 320.40000000000003

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## Environmental Resource Mapper

Base Map: Topographical | Using this map

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**Other Wetland Layers**

- ☒ National Wetlands Inventory
- ☐ Estuarine and Marine Deepwater
- ☐ Estuarine and Marine Wetland
- ☐ Freshwater Emergent Wetland
- ☐ Freshwater Forested/Shrub Wetland
- ☐ Freshwater Pond

Reference Layers

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## **WHITE PINE COMMERCE PARK**

### **SEQRA RESOLUTION**

A special meeting of the Onondaga County Industrial Development Agency was convened in public session, remotely by conference call or similar service pursuant to New York State Executive Order 202.97 on May 6, 2021, at 10:45 a.m., local time.

The meeting was called to order by the (Vice) Chairman of the Agency and, upon roll being called, the following members of the Agency were:

**PRESENT:** Patrick Hogan  
Janice Herzog  
Steve Morgan  
Susan Stanczyk  
Kevin Ryan

**ABSENT:** Victor Ianno  
Fanny Villarreal

**ALSO PRESENT:** Robert M. Petrovich, Executive Director  
Jeffrey W. Davis, Esq., Agency Counsel  
Amanda M. Fitzgerald, Esq., Agency Counsel

The following resolution was offered by Janice Herzog, seconded by Steve Morgan, to wit:

#### **RESOLUTION DETERMINING PURSUANT TO THE STATE ENVIRONMENTAL QUALITY REVIEW ACT THAT THE DRAFT SUPPLEMENTAL GENERIC ENVIRONMENTAL IMPACT STATEMENT PREPARED FOR THE PROPOSED EXPANSION OF THE WHITE PINE COMMERCE PARK PROJECT IS ADEQUATE FOR COMMENCEMENT OF PUBLIC REVIEW**

WHEREAS, Onondaga County Industrial Development Agency (the "Agency") is authorized and empowered by the provisions of Chapter 1030 of the 1969 Laws of New York,

constituting Title 1 of Article 18-A of the General Municipal Law, Chapter 24 of the Consolidated Laws of New York, as amended (the "Enabling Act"), Chapter 435 of the Laws of 1970 of the State of New York and Chapter 676 of the Laws of 1975 of the State of New York, as amended (said Chapter and the Enabling Act being hereinafter collectively referred to as the "Act") to promote, develop, encourage and assist in the acquiring, constructing, reconstructing, improving, maintaining, equipping and furnishing of manufacturing, warehousing, research, commercial and industrial facilities, among others, for the purpose of promoting, attracting and developing economically sound commerce and industry to advance the job opportunities, health, general prosperity and economic welfare of the people of the State of New York, to improve their prosperity and standard of living, and to prevent unemployment and economic deterioration; and

WHEREAS, to accomplish its stated purposes, the Agency is authorized and empowered under the Act to acquire, construct, reconstruct and install "projects" (as defined in the Act) or to cause said projects to be acquired, constructed, reconstructed and installed, and to convey said projects or to lease said projects with the obligation to purchase; and

WHEREAS, the Agency currently owns White Pine Commerce Park ("Park") located northeast of the intersection of NYS Route 31 and Caughdenoy Road in the Town of Clay, Onondaga County, New York; and

WHEREAS, in an effort to transform the Park into a modern industrial park for advanced manufacturing and state-of-the-art industrial uses, the Agency previously performed a thorough environmental review of the Park and its anticipated environmental impacts pursuant to Article 8 of the Environmental Conservation Law of the State of New York, as amended, and the regulations of the Department of Environmental Conservation of the State of New York promulgated thereunder (collectively referred to hereinafter as "SEQRA"), which included, but was not limited to, the following: (1) classifying the Park project as a Type 1 action; (2) acting as Lead Agency for the purpose of a coordinated environmental review; (3) conducting necessary studies and holding required hearings in connection with the preparation of a Generic Environmental Impact Statement ("GEIS") to address anticipated potential impacts associated with the proposed multi-use industrial park; (4) preparation of a subsequent Final GEIS ("FGEIS") that incorporated the DGEIS by reference and included responses to public comments received; and (5) preparation and issuance by the Agency of a Findings Statement in October of 2013 that (a) concluded the project avoided or minimized adverse environmental impacts to the maximum extent practicable, (b) incorporated mitigation measures that were considered practicable, and (c) identified certain impact thresholds that, if exceeded, may require supplemental determinations of their significance and/or impact evaluation, and possibly mitigation measures in addition to those identified; and

WHEREAS, the Park was created to be capable of supporting a mix of industrial and/or commercial uses with related office space, advanced state-of-the-art research, large- or small-scale manufacturing, assembly, warehousing, data management, material processing and distribution facilities in a campus-like setting; and

WHEREAS, since 2013, the Agency has attempted to market the Park for development around the country to potential manufacturing and industrial users, but those efforts have been unsuccessful and the Park remains vacant; and

WHEREAS, through its marketing efforts and communications with desired tenants around the country, the Agency has determined the Park is not large enough and must be expanded significantly to be considered an attractive, viable location for prospective large- and small-scale manufacturing and industrial developers; and

WHEREAS, the Agency has devoted substantial time and effort into determining the highest and best use of the Park, with a particular focus on site attributes that will bring high-tech facilities and high paying jobs to Onondaga County; and

WHEREAS, the Agency has focused its efforts on the semiconductor industry, and those efforts have been unsuccessful to date as it has become apparent that a larger geographic footprint is necessary in order to support this type of industry and the associated investment required by a prospective tenant(s); and

WHEREAS, the Agency, as Project Sponsor, proposes to expand the Park to approximately 1,250± acres (the "Project" or "Action"), of which the Agency currently owns approximately 648± acres, has another 282± acres under contract, and would acquire approximately 320± additional acres, with such additional acreage consisting of parcels contiguous to the current Park and generally located along NYS Route 31 and along the east and west sides of Burnet Road, and which will be acquired by the Agency through purchase agreements with existing landowners or, if necessary, pursuant to the Eminent Domain Procedure Law ("EDPL"), to avoid fragmented parcels that would hinder future development; and

WHEREAS, pursuant to SEQRA, the Agency is required to make a determination whether the "action" (as said quoted term is defined in SEQRA) to be taken by the Agency may have a "significant impact on the environment" (as said quoted term is utilized in SEQRA) and the preliminary agreement of the Agency to undertake the Project constitutes such an action; and

WHEREAS, pursuant to SEQRA (6 NYCRR § 617.9(7)(i)), the Agency recognizes the proposed Project represents a significant change from the Park's current footprint that presents changed circumstances from those evaluated by the Agency under its prior SEQRA review in 2013; and

WHEREAS, the Agency prepared and completed a Full Environmental Assessment Form (the "FEAF") to aid in determining whether undertaking the Project may have a significant adverse impact upon the environment; and

WHEREAS, pursuant to a resolution adopted on December 8, 2020, the Agency determined that the Project was a Type I action, issued a positive declaration, declared its intent to act as “lead agency” (as said quoted term is defined in SEQRA), and resolved that a Supplemental Generic Environmental Impact Statement (“SGEIS”) will be prepared; and

WHEREAS, pursuant to SEQRA, the Agency notified each identified “involved agency” (as said quoted term is defined in SEQRA) of its intent to act as lead agency concerning the coordinated environmental review of the Project; and

WHEREAS, no involved agency objected to the Agency acting as lead agency; and

WHEREAS, the Agency, with the assistance of its consultants, has prepared a Draft SGEIS; and

WHEREAS, the Agency has completed its preliminary review of the Draft SGEIS and has analyzed the Draft SGEIS for compliance with the applicable SEQRA regulations;

**NOW, THEREFORE,** be it resolved by the members of the Onondaga County Industrial Development Agency as follows:

- (1) The Agency hereby confirms its status as lead agency concerning the coordinated environmental review of the Project.
- (2) Based upon an examination of the Draft SGEIS prepared for the Project, the criteria contained in 6 NYCRR Part 617, including §617.9, and based further upon the Agency’s knowledge of the area surrounding the Project, and such further investigation of the Project and its potential significant environmental impacts as the Agency has deemed appropriate, the Agency determines and finds that the Draft SGEIS, dated May 6, 2021, is complete for commencement of the public review pursuant to SEQRA.
- (3) The Agency hereby adopts a Notice of Completion of Draft SGEIS and Notice of Public Hearing (the “Notice of Completion”) concerning the Project, which is attached hereto as Exhibit A.
- (4) The public comment period concerning the Draft SGEIS shall commence upon the filing and circulation of a notice of completion pursuant to the requirements of SEQRA, and such public comment period shall remain open until June 11, 2021.
- (5) The Agency shall arrange for filing and distribution of the Notice of Completion and Draft SGEIS pursuant to the requirements of SEQRA.

- (6) Copies of the Draft SGEIS and Notice of Completion, as well as a copy of this Resolution, shall be placed on file in the office of the Agency where the same shall be available for public inspection during business hours, and a copy shall also be made available for public review at the Town of Clay Town Hall, 4401 Route 31, Clay, NY 13041.
- (7) This Resolution shall take effect immediately

The question of the adoption of the foregoing resolution was duly put to vote on a roll call, which resulted as follows:

	<u>AYE</u>	<u>NAY</u>	<u>ABSENT</u>
Patrick Hogan	x		
Janice Herzog	x		
Victor Ianno			x
Steve Morgan	x		
Susan Stanczyk	x		
Kevin Ryan	x		
Fanny Villarreal			x

The foregoing resolution was thereupon declared duly adopted.



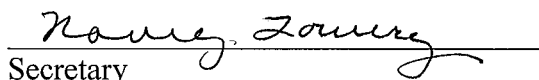
STATE OF NEW YORK                    )  
  ) SS.:  
COUNTY OF ONONDAGA                )

I, the undersigned Secretary of the Onondaga County Industrial Development Agency, DO HEREBY CERTIFY that I have compared the annexed extract of the minutes of the meeting of the Onondaga County Industrial Development Agency (the "Agency") held on May 6, 2021, with the original thereof on file in my office, and that the same (including all exhibits) is a true and correct copy of the proceedings of the Agency and of the whole of such original insofar as the same relates to the subject matters referred to therein.

I FURTHER CERTIFY that (i) all members of the Agency had due notice of such meeting, (ii) pursuant to Section 104 of the Public Officers Law (Open Meetings Law), such meeting was open to the general public and public notice of the time and place of such meeting was duly given in accordance with such Section 104, (iii) the meeting was in all respects duly held, and (iv) there was a quorum present throughout.

I FURTHER CERTIFY that, as of the date hereof, the attached resolution is in full force and effect and has not been amended, repealed or rescinded.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of the Agency this \_\_\_\_ day of May, 2021.

  
Secretary

(S E A L)

## EXHIBIT A

**STATE ENVIRONMENTAL QUALITY REVIEW  
NOTICE OF COMPLETION OF DRAFT SUPPLEMENTAL GENERIC  
ENVIRONMENTAL IMPACT STATEMENT AND  
NOTICE OF SEQRA HEARING**

**Date:** May 6, 2021

**Lead agency:** Onondaga County Industrial Development Agency (OCIDA)

**Address:** Robert Petrovich, Executive Director  
Onondaga County Industrial Development Agency  
333 West Washington St., Suite 130  
Syracuse, New York 13202

This notice is issued pursuant to Part 617 of the implementing regulations pertaining to Article 8, State Environmental Quality Review Act of the Environmental Conservation Law.

A Draft Supplemental Generic Environmental Impact Statement (“GEIS”) has been completed and accepted for the proposed action described below. Comments are requested and will be accepted by OCIDA until June 11, 2021 in writing to the address above, or via email to: [economicdevelopment@ongov.net](mailto:economicdevelopment@ongov.net). A public hearing on the Draft Supplemental GEIS will be held virtually on May 24, 2021 at 6:00 p.m. Anyone wishing to be heard may participate in the hearing using the information below.

Webcast public hearing information:

Topic: OCIDA White Pine Draft Supplemental GEIS 2021 Public Hearing  
Time: May 24, 2021 6:00 pm Eastern Time (US and Canada)

Join Zoom Meeting

<https://us02web.zoom.us/j/81266706416?pwd=cDl0S05nVXpzcW9VMUIKOGZscHNEQT09>

Meeting ID: 812 6670 6416

Passcode: XBf8bW

One tap mobile

+19294362866,,81266706416#,,,\*058990# US (New York)

Dial by your location

+1 929 436 2866 US (New York)

Meeting ID: 812 6670 6416

Passcode: 058990

Find your local number: <https://us02web.zoom.us/u/kemOKIg0tq>

**Name of Action & Location of Action:**

White Pine Commerce Park (formerly known as Clay Business Park)  
5171 Route 31  
Town of Clay, New York

**Description of Action:**

OCIDA, as Project Sponsor, proposes to expand its existing White Pine Commerce Park (“Park”), formerly known as the Clay Business Park, to approximately 1,250± acres (the “Project”). The Park is located northeast of the intersection of NYS Route 31 and Caughdenoy Road in the Town of Clay, Onondaga County, New York. OCIDA currently owns approximately 648± acres, has another 282± acres under contract, and would acquire approximately 320± additional acres through purchase agreements with existing landowners or, if necessary, pursuant to the Eminent Domain Procedure Law to avoid fragmented parcels that would hinder future development. The Project purpose is to expand the Park to enable OCIDA to market the Park to a larger, more diverse mix of potential industrial and commercial developers, by making the site more attractive to a broader scope of industries, particularly the semiconductor industry, and bringing high tech and high paying jobs to Onondaga County.

OCIDA originally created the Park in 2013. At that time, OCIDA determined the creation of the Park was a Type 1 Action under SEQRA and it had the potential for at least one significant adverse environmental impact. OCIDA subsequently issued a positive declaration and required the preparation of a Draft Generic Environmental Impact Statement (“DGEIS”). In September 2013, OCIDA adopted a Final GEIS (“FGEIS”) for the Park. It subsequently issued its Findings Statement certifying that the requirements of SEQRA had been met and the Park was “[c]onsistent with social, economic and other essential considerations from among the reasonable alternatives available, the action is the one that avoids or minimizes adverse environmental impacts to the maximum extent practicable, and that adverse impacts will be avoided or minimized to the maximum extent practicable by incorporating as conditions to the decision those mitigation measures that were identified as practicable[.]”

The scope of the Project and changes in circumstances since OCIDA’s 2013 SEQRA review warrant further review under SEQRA. OCIDA has prepared the Draft Supplemental GEIS to evaluate Project changes that have occurred since 2013.

**Potential Environmental Impacts**

Potential impacts associated with the proposed Project are identified in the Full Environmental Assessment Form, evaluated in the Draft Supplemental GEIS, and include the following: zoning and land use; community character; transportation and traffic; energy and utilities; topography, geology, soils and groundwater; water resources; air resources; climate change; human health; ecological resources; cultural and archaeological resources; visual resources; and noise, odor and light. These impacts, which may be reasonably expected to result from the Project, have been compared to the criteria for determining significance identified in 6 N.Y.C.R.R. § 617.7(c)(1) and in accordance with 6 N.Y.C.R.R. § 617.7(c)(2) and (3).

The Draft Supplemental GEIS is available for review at the following:

- OCIDA's website at: <https://www.ongoved.com/ocida/project-documents/>.
- Onondaga County Industrial Development Agency  
Attn: Robert Petrovich, Executive Director  
333 West Washington St., Suite 130  
Syracuse, New York 13202  
(315) 435-3770
- Town of Clay Town Hall  
4401 Route 31  
Clay, NY 13041  
(315) 652-3800

A copy of the Draft Supplemental GEIS may also be obtained from OCIDA upon request.

Involved and Interested Agencies:

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

Edward Wisnowski, Chairman  
Town of Clay Zoning Board of Appeals  
4401 State Route 31  
Clay, NY 13041

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

Matthew Marko, Regional Director  
New York State Department of Environmental Conservation  
615 Erie Boulevard West  
Syracuse, New York 13204-2400

Basil Seggos, Commissioner  
New York State Department of Environmental Conservation  
625 Broadway  
Albany, NY 12233

Martin E. Voss, Commissioner  
Onondaga County Department of Transportation  
John H. Mulroy Civic Center  
421 Montgomery Street, 11th Floor  
Syracuse, New York 13202

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

Dan Kwasnowski, Planning Director  
Syracuse-Onondaga County Planning Agency  
John H. Mulroy Civic Center  
421 Montgomery Street, 11th Floor  
Syracuse, New York 13202



Frank M. Mento, P.E., Commissioner  
Onondaga County Water Environment Protection  
650 Hiawatha Boulevard  
Syracuse, New York 13204

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

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

New York State Office of Parks, Recreation  
& Historic Preservation  
Erik Kulleseid, Commissioner  
625 Broadway  
Albany NY 12207

Onondaga County Water Authority  
Michael Hooker, Executive Director  
200 Northern Concourse  
North Syracuse, NY 13212

U.S. Army Corps of Engineers  
Lt. Col. Eli Adams, Commander  
Buffalo District  
1776 Niagara Street  
Buffalo, NY 14207

U.S. Fish & Wildlife Service  
New York Field Office  
3817 Luker Road  
Cortland, NY 13045

U.S. Fish & Wildlife Service  
Northeast Region  
300 Westgate Center Dr.  
Hadley, MA 01035

Indu Gupta, M.D., MPH  
Commissioner of Health

Onondaga County Department of Health  
Bureau of Public Health Engineering  
421 Montgomery Street, 12th Floor  
Syracuse, NY 13202

James D'Agostino, Director  
Syracuse Metropolitan Transportation Council  
126 North Salina Street  
100 Clinton Square, Suite 100

Bill Meyer, Supervisor  
Town of Cicero  
8236 Brewerton Road  
Cicero, NY 13039

## **WHITE PINE COMMERCE PARK**

### **PUBLIC HEARING RESOLUTION**

A special meeting of the Onondaga County Industrial Development Agency was convened in public session, remotely by conference call or similar service pursuant to New York State Executive Order 202.105 on May 6, 2021, at 10:45 a.m., local time.

The meeting was called to order by the Chairman of the Agency and, upon roll being called, the following members of the Agency were:

**PRESENT:** Patrick Hogan  
Janice Herzog  
Steve Morgan  
Susan Stanczyk  
Kevin Ryan

**ABSENT:** Victor Ianno  
Fanny Villarreal

**ALSO PRESENT:** Robert M. Petrovich, Executive Director  
Jeffrey W. Davis, Esq., Agency Counsel  
Amanda M. Fitzgerald, Esq., Agency Counsel

The following resolution was offered by Susan Stanczyk, seconded by Janice Herzog, to wit:

#### **RESOLUTION AUTHORIZING A PUBLIC HEARING IN CONNECTION WITH THE DRAFT SUPPLEMENTAL GENERIC ENVIRONMENTAL IMPACT STATEMENT PREPARED FOR THE PROPOSED EXPANSION OF THE WHITE PINE COMMERCE PARK PROJECT**

WHEREAS, Onondaga County Industrial Development Agency (the "Agency") is authorized and empowered by the provisions of Chapter 1030 of the 1969 Laws of New York, constituting Title 1 of Article 18-A of the General Municipal Law, Chapter 24 of the Consolidated Laws of New York, as amended (the "Enabling Act"), Chapter 435 of the Laws of 1970 of the State of New York and Chapter 676 of the Laws of 1975 of the State of New York, as amended, constituting Section 895 of said General Municipal Law (said Chapter and the Enabling Act being hereinafter collectively referred to as the "Act") to promote, develop, encourage and assist in the acquiring, constructing, reconstructing, improving, maintaining, equipping and furnishing of manufacturing, warehousing, research, commercial and industrial facilities, among others, for the purpose of promoting, attracting and developing economically sound commerce and industry to advance the job opportunities, health, general prosperity and economic welfare of the people of

the State of New York, to improve their prosperity and standard of living, and to prevent unemployment and economic deterioration; and

WHEREAS, to accomplish its stated purposes, the Agency is authorized and empowered under the Act to acquire, construct, reconstruct and install one or more "projects" (as defined in the Act), or to cause said projects to be acquired, constructed, reconstructed and installed, and to convey said projects or to lease said projects with the obligation to purchase; and

WHEREAS, the Agency currently owns White Pine Commerce Park ("Park") located northeast of the intersection of NYS Route 31 and Caughdenoy Road in the Town of Clay, Onondaga County, New York; and

WHEREAS, in an effort to transform the Park into a modern industrial park for advanced manufacturing and state-of-the-art industrial uses, the Agency previously performed a thorough environmental review of the Park and its anticipated environmental impacts pursuant to Article 8 of the Environmental Conservation Law of the State of New York, as amended, and the regulations of the Department of Environmental Conservation of the State of New York promulgated thereunder (collectively referred to hereinafter as "SEQRA"), which included, but was not limited to, the following: (1) classifying the Park project as a Type 1 action; (2) acting as Lead Agency for the purpose of a coordinated environmental review; (3) conducting necessary studies and holding required hearings in connection with the preparation of a Generic Environmental Impact Statement ("GEIS") to address anticipated potential impacts associated with the proposed multi-use industrial park; (4) preparation of a subsequent Final GEIS ("FGEIS") that incorporated the DGEIS by reference and included responses to public comments received; and (5) preparation and issuance by the Agency of a Findings Statement in October of 2013 that (a) concluded the project avoided or minimized adverse environmental impacts to the maximum extent practicable, (b) incorporated mitigation measures that were considered practicable, and (c) identified certain impact thresholds that, if exceeded, may require supplemental determinations of their significance and/or impact evaluation, and possibly mitigation measures in addition to those identified; and

WHEREAS, through its marketing efforts and communications with desired tenants around the country, the Agency has determined the Park is not large enough and must be expanded significantly to be considered an attractive, viable location for prospective large- and small-scale manufacturing and industrial developers; and

WHEREAS, the Agency, as Project Sponsor, proposes to expand the Park to approximately 1,250± acres (the "Project" or "Action"), of which the Agency currently owns approximately 648± acres, has another approximately 282± acres under contract, and would acquire approximately 320± additional acres, with such additional acreage consisting of parcels contiguous to the Park and generally located along NYS Route 31 and along the east and west sides of Burnet Road, and which will be acquired by the Agency through purchase agreements with existing landowners or, if necessary, pursuant to the Eminent Domain Procedure Law ("EDPL"), to avoid fragmented parcels that would hinder future development; and

WHEREAS, pursuant to a resolution adopted on December 8, 2020, the Agency determined that the Project was a Type I action, issued a positive declaration, declared its intent to act as "lead agency" (as said quoted term is defined in SEQRA), and resolved that a Supplemental Generic Environmental Impact Statement ("SGEIS") will be prepared; and

WHEREAS, pursuant to SEQRA, the Agency notified each identified "involved agency" (as said quoted term is defined in SEQRA) of its intent to act as lead agency concerning the coordinated environmental review of the Project; and

WHEREAS, no involved agency objected to the Agency acting as lead agency; and

WHEREAS, the Agency, with the assistance of its consultants, has prepared a Draft SGEIS; and

WHEREAS, the Agency has completed its preliminary review of the Draft SGEIS and has analyzed the Draft SGEIS for compliance with the applicable SEQRA regulations;

WHEREAS, the Agency deemed the Draft SGEIS complete for commencement of public review pursuant to SEQRA on May 6, 2021;

WHEREAS, pursuant to 6 NYCRR §617.9, any approval of the Project contained herein is contingent upon a determination by the members of the Agency to proceed with the Project following satisfaction of the public hearing and notice requirements and other procedural requirements that relate to the Project and the New York State Environmental Quality Review Act.

NOW, THEREFORE, BE IT RESOLVED BY THE MEMBERS OF THE ONONDAGA COUNTY INDUSTRIAL DEVELOPMENT AGENCY AS FOLLOWS:

- (1) Pursuant to 6 NYCRR §617.9, the Agency shall hold a public hearing concerning the Draft SGEIS on May 24, 2021 at 6:00 p.m., which hearing shall be held remotely in accordance with the modifications to Article 7 of the Public Officers Law (the "Open Meetings Law") as modified by New York Governor Andrew Cuomo's Executive Order 202.1.
- (2) This Resolution shall take effect immediately.

The question of the adoption of the foregoing Resolution was duly put to a vote on roll call, which resulted as follows:

	<u>AYE</u>	<u>NAY</u>	<u>ABSENT</u>	<u>ABSTAIN</u>
Patrick Hogan	x			
Janice Herzog	x			
Victor Ianno			x	
Steve Morgan	x			
Susan Stanczyk	x			
Kevin Ryan	x			
Fanny Villarreal			x	

The Resolution was thereupon declared duly adopted.



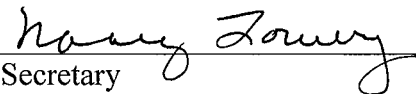
STATE OF NEW YORK                    )  
  ) SS.:  
COUNTY OF ONONDAGA                )

I, the undersigned Secretary of the Onondaga County Industrial Development Agency, DO HEREBY CERTIFY that I have compared the annexed extract of the minutes of the meeting of the Onondaga County Industrial Development Agency (the "Agency") held on May 6, 2021, with the original thereof on file in my office, and that the same (including all exhibits) is a true and correct copy of the proceedings of the Agency and of the whole of such original insofar as the same relates to the subject matters referred to therein.

I FURTHER CERTIFY that (i) all members of the Agency had due notice of such meeting, (ii) pursuant to Section 104 of the Public Officers Law (Open Meetings Law), as modified by New York State Executive Order 202.105, such meeting was open to the general public and public notice of the time and place of such meeting was duly given in accordance with such Section 104, (iii) the meeting was in all respects duly held, and (iv) there was a quorum present throughout.

I FURTHER CERTIFY that, as of the date hereof, the attached resolution is in full force and effect and has not been amended, repealed or rescinded.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of the Agency this \_\_\_\_ day of May, 2021.

  
Secretary

(S E A L)

# THE POST-STANDARD

## LEGAL AFFIDAVIT

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# ADVANCE

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Sales Rep: Pamela Gallagher

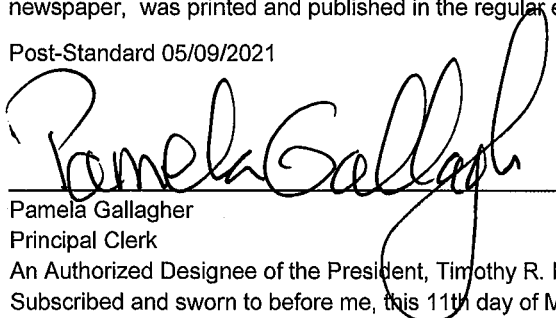
Account Number: 1000737265

INV#: 0009971610

Date	Position	Description	P.O. Number	Ad Size
05/09/2021	Other Legals NY	NOTICE OF SEQRA PUBLIC HEARING White Pine Commerce	PH White Pine	2 x 67.00 CL

State of New York, County of Onondaga ss. Pamela Gallagher, of the City of Syracuse, in said County, being duly sworn, doth depose and says: this person is the Principal Clerk in the office of THE POST-STANDARD, a public newspaper, published in the City of Syracuse, Onondaga County, New York and that the notice, is an accurate and true copy of the ad as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following days, viz.:

Post-Standard 05/09/2021

  
Pamela Gallagher  
Principal Clerk

An Authorized Designee of the President, Timothy R. Kennedy  
Subscribed and sworn to before me, this 11th day of May 2021

  
NOTARY PUBLIC

FOR QUESTIONS CONCERNING THIS AFFIDAVIT,  
PLEASE CONTACT PAMELA GALLAGHER AT  
(315) 470-2051 OR Legals@Syracuse.com

JULIA FREEMAN  
NOTARY PUBLIC, STATE OF NEW YORK  
Registration No. 01FR6405211  
Qualified in Onondaga County  
My Commission Expires. 3/2/24

Date	Position	Description	P.O. Number	Ad Size
05/09/2021	Other Legals NY	NOTICE OF SEQRA PUBLIC HEARING White Pine Commerce	PH White Pine	2 x 67.00 CL

**NOTICE OF SEQRA PUBLIC HEARING** White Pine Commerce Park NYS Route 31 and Caughdenoy Road Town of Clay, Onondaga County, New York  
Lead agency: Onondaga County Industrial Development Agency Robert Petrovich, Executive Director 333 West Washington Street, Suite 130 Syracuse, New York 13202 NOTICE IS HEREBY GIVEN that a public hearing pursuant Part 617 of the implementing regulations pertaining to Article 8 of the State Environmental Quality Review Act of the Environmental Conservation Law will be held by the Onondaga County Industrial Development Agency (the "Agency"). Public Hearing Date and Time: May 24, 2021 6:00 pm Eastern Time (US and Canada) Public Hearing Location: Held via Zoom meeting: <https://us02web.zoom.us/j/81266706416> Meeting ID: 812 6670 6416 One tap mobile +19294362866,,81266706416# US (New York) +13017158592,,81266706416# US (Washington DC) Dial by your location +1 929 436 2866 US (New York) +1 301 715 8592 US (Washington DC) +1 312 626 6799 US (Chicago) +1 346 248 7799 US (Houston) +1 669 900 6833 US (San Jose) +1 253 215 8782 US (Tacoma) Meeting ID: 812 6670 6416 Find your local number: <https://us02web.zoom.us/j/81266706416> For assistance or questions regarding the public hearing please contact the Agency. The public hearing is being held in connection with the following matter: The Agency, as Project Sponsor, proposes to expand its existing White Pine Commerce Park ("Park"), formerly known as the Clay Business Park, to approximately 1,250± acres (the "Project"). The Park is located northeast of the intersection of NYS Route 31 and Caughdenoy Road in the Town of Clay, Onondaga County, New York. The Agency currently owns approximately 648± acres, has another approximately 282± acres under contract, and would acquire approximately 320± additional acres through purchase agreements with existing landowners or, if necessary, pursuant to the Eminent Domain Procedure Law to avoid fragmented parcels that would hinder future development. A Draft Supplemental Generic Environmental Impact Statement ("Draft Supplemental GEIS") has been completed and accepted for the proposed Project. The Agency will, at the above-stated time and place, hear all comments with respect to the Draft Supplemental GEIS. A copy of the Draft Supplemental GEIS is available on OCIDA's website at: <https://www.ongov.net/ocida/project-documents/>. The Draft Supplemental GEIS may also be viewed at OCIDA's office above, or the Town of Clay Town Hall, 4401 Route 31, Clay, NY 13041. This public hearing will be held by remote means, by Zoom meeting and telephone conference call, in accordance with the modifications to Article 7 of the Public Officers Law (the "Open Meetings Law") as modified by New York Governor Andrew Cuomo's Executive Order 202.1, as extended in response to the COVID-19 pandemic. A copy of a recording of the hearing will be available on the Agency's website. Written comments will be accepted by the Agency until June 11, 2021 and may be submitted to OCIDA at the address above or via email to [economicdevelopment@ongov.net](mailto:economicdevelopment@ongov.net).

# ENB Region 7 Notices 5/12/2021

## Notice of Acceptance of Draft SGEIS and Public Hearing

**Onondaga County** - The Onondaga County Industrial Development Agency (OCIDA), as lead agency, has accepted a Draft Supplemental Generic Environmental Impact Statement on the proposed White Pine Commerce Park (formerly known as Clay Business Park). **A virtual public hearing on the Draft SGEIS will be held on May 24, 2021 at 6:00 p.m. via ZOOM.** Information regarding the public hearing via zoom can be obtained at: <https://www.ongovед.com/ocida/> . Written comments on the Draft SGEIS will be accepted until June 11, 2021. The Draft EIS is available from the contact listed below and on line at: <https://www.ongovед.com/ocida/project-documents/>.

The action involves a proposal to expand the existing White Pine Commerce Park (Park), formerly known as the Clay Business Park, to approximately 1,250 ± acres (Project). OCIDA currently owns approximately 648 ± acres, has another 282 ± acres under contract, and would acquire approximately 320± additional acres through purchase agreements with existing landowners or, if necessary, pursuant to the Eminent Domain Procedure Law to avoid fragmented parcels that would hinder future development. The Project purpose is to expand the Park to enable OCIDA to market the Park to a larger, more diverse mix of potential industrial and commercial developers, by making the site more attractive to a broader scope of industries, particularly the semiconductor industry, and bringing high tech and high paying jobs to Onondaga. The project is located at 5171 Route 31 in the Town of Clay, New York.

**Contact:** Robert Petrovich, Onondaga County Industrial Development Agency, 333 West Washington Street, Suite 130, Syracuse, NY 13202, Phone: (315) 435-3770, E-mail: [economicdevelopment@ongov.net](mailto:economicdevelopment@ongov.net).

## **APPENDIX B**

**May 24, 2021 Public Hearing Transcript**



1 5-24-2021 - SEQRA Hearing

2 NEW YORK STATE

3 ONONDAGA COUNTY INDUSTRIAL DEVELOPMENT AGENCY

4  
5 STATE ENVIRONMENTAL QUALITY REVIEW

6 NOTICE OF COMPLETION OF DRAFT SUPPLEMENTAL

7 GENERIC ENVIRONMENTAL IMPACT STATEMENT

8 NOTICE OF SEQRA HEARING

9  
10  
11 DATE: May 24, 2021 at 6:05 p.m.

12 VENUE: Zoom Remote Connection

13 MODERATOR: JEFF DAVIS, COUNSEL FOR OCIDA

14  
15  
16  
17  
18  
19  
20 Reported by Annette Lainson



1 5-24-2021 - SEQRA Hearing

2 APPEARANCES:

3 ROB SIMPSON

JEFF RUBIN

4 LUKE MURPHY

BUD LOURA

5 RANDY WOLKEN

MAUREEN MATTHEW

6 ALBERTO BIANCHETTI

MARY SNYDER

7 MIMTCH LATIMER

MIKE NASH

8

ERIK SMITH

ANDY BREWER

9

DARLENE PIPER

10 HANNAH HENLEY

CRAIG MARCA

GREG LANCETTE

11 JIM MASON

MARY M. THOMPSON

12 RAY RUDOLPH

JOHN W. DAN

13 RICK SHORT

DAVID

WILHITE

14 LIDIA PIERCE

RYAN PLESKACH

15

BARBARA O'BRIEN

MICHELLE NUZZO

16

ANNETTE CAPRIA

GARY MACE

17

KEVIN J. MEAKER

18 RENEE CORDELL

KEVIN SCHWAB

19 CODY KELLY

20

21

22

23

24

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25

5-24-2021, SEQRA Hearing

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1 5-24-2021 - SEQRA Hearing

2 (The meeting commenced at 6:05 p.m.)

3 MR. DAVIS: Good evening everyone.

4 Again my name is Jeff Davis, counsel for OCIDA. I  
5 will be moderating tonight's public hearing  
6 concerning the draft environmental impact statement  
7 of the proposed expansion of the White Pine Commerce  
8 Park. If you would like to comment please enter your  
9 name in the chat function here on Zoom. There's a  
10 button at the bottom that says chat. We're getting  
11 people that would like to speak. If you're on your  
12 phone, please hit star nine and that will raise your  
13 hand so that we know that you're on the phone and  
14 you'd like.

15 This public comment hearing is being  
16 held in conjunction with the following project,  
17 OCIDA, is project sponsor, proposes to expand its  
18 existing White Pine Commerce Park, to approximately  
19 1,250 plus or minus acres. The Park is located  
20 northeast of the intersection of NYS Route 31 and  
21 Caughdenoy Road in the Town of Clay, Onondaga County,  
22 New York. OCIDA currently owns approximately six  
23 hundred and forty- eight acres, has another  
24 approximately two hundred and eighty two acres under  
25 contract. And will require approximately three

1 5-24-2021 - SEQRA Hearing

2 hundred and twenty plus or minus additional acres in  
3 purchase agreements with existing landowners or if  
4 necessary pursuant to the Eminent Domain Procedure  
5 Law, that would fragment parcels that would hinder  
6 future development.

7 The Park was previously evaluated by  
8 OCIDA under the State Environmental Quality Review  
9 Act, also known as SEQRA culminated in a final  
10 environmental impact statement, in September 2013.  
11 As a result, a draft supplemental generic  
12 environmental impact statement has been prepared to  
13 propose expansion to evaluate changes since the final  
14 E.I.S was adopted in 2013. In its May 6, 2021  
15 meeting, OCIDA accepted the draft supplemental  
16 G.E.I.S. and added it for public review and comment.  
17 A copy of the draft supplemental G.E.I.S. is  
18 available on OCIDA's website, may also be viewed at  
19 OCIDA's offices at 333 West Washington Street, Suite  
20 130, Syracuse, New York 13202 or the Town of Clay  
21 Hall at 440 Route 31, Clay, New York.

22 This public comment hearing is being  
23 held remotely by Zoom and telephone conference call  
24 in accordance with the modifications to article seven  
25 of the public officers law, also known as the Open

1 5-24-2021 - SEQRA Hearing

2 Meetings law, as modified by New York Governor Andrew  
3 Cuomo's executive order 202.1 as extended in response  
4 to the COVID 19 pandemic. A copy of a recording of  
5 tonight's public hearing will be available at OCIDA's  
6 website. Pursuant to NYCRR part 621.8 OCIDA  
7 published notice of the availability of the draft  
8 supplemental G.E.I.S. and this public hearing in the  
9 D.E.C.'s environmental notice bulletin on May 12,  
10 2021.

11 Notice of the availability of the  
12 draft supplemental G.E.I.S. and this public hearing  
13 was also published in the Syracuse Post Standard on  
14 May 9, 2021. OCIDA is ... as lead agency for the  
15 purpose of conducting this coordinated environmental  
16 review of the public park expansion pursuant to the  
17 State Environmental Quality Review Act. The public  
18 hearing is being held in furtherance of a SEQRA  
19 process and is intended solely for members of the  
20 public to provide comments on the draft supplemental  
21 G.E.I.S. for the record which will be incorporated  
22 into the final supplemental G.E.I.S. to be prepared  
23 by a OCIDA.

24 Please understand that this evening is  
25 not a question and answer session. This session is

1                                   5-24-2021     -   SEQRA Hearing  
2           being recorded, and there is a court reporter present  
3           that will produce a transcript of the session. In  
4           order to ensure that the court reporter adequately,  
5           adequately records tonight's comments. Please  
6           announce yourself and spell your full name. Also,  
7           please make sure that you speak clearly when you are  
8           called on to speak. We have several people  
9           registered to speak this evening. Because of the  
10          number of people who have registered to speak, we  
11          will require that each speaker stay within a three-  
12          minute time limit for verbal comments today. In  
13          order to accommodate as many speakers as possible to  
14          three limit -- three minute time limit will be  
15          strictly enforced. I will notify speakers at the two  
16          minute and thirty second mark by raising my hand,  
17          you will all see me on the screen because I will stay  
18          focused on your screen. Will alert the speakers that  
19          their time is almost over. At the three minute mark  
20          I will step in, let them know that their time is  
21          over, and we can mute on our end if people refuse to  
22          stop speaking.

23                               In addition to allow for the maximum  
24          number of speakers to be heard. If your comment has  
25          already been made, you will not need to repeat the



1                               5-24-2021     -   SEQRA Hearing  
2           comments as each comment or category -- category of  
3           comments if they're the same will be addressed in the  
4           final G.E.I.S.. In addition, all comments may be  
5           submitted in writing. Written comments may be  
6           accepted by the agency until June 11th, 2021 and may  
7           be submitted to Robert Petrovich, Executive Director  
8           of OCIDA at 333 West Washington Street, suite 130  
9           Syracuse, New York or via email to the economic  
10          development at ongov.net email address. Same weight  
11          and consideration will be given to written comments  
12          as those expressed this evening in this hearing.

13                           A few more housekeeping items before  
14          we get started. For those attending through the Zoom  
15          link, you will all remain muted until it is your turn  
16          to speak. Again, please type your name into the chat  
17          function so that we know that you wish to speak. I  
18          will announce the name of the speaker as well as the  
19          next speaker in line, so that the speakers know that  
20          they're on-deck and prepared so we can move things  
21          forward promptly. If someone does not respond  
22          timely, when I -- when we call their name, we will  
23          move on to the next person. For those attending via  
24          phone that wish to speak, you either again press star  
25          nine to raise your hand, and then when we call your

1 5-24-2021 - SEQRA Hearing  
2 name or telephone number, because it'll be by number,  
3 you will unmute yourself by using star six. We will  
4 call out the phone number and ask you to unmute  
5 again. And I'll repeat those directions when they  
6 get to a phone person. Again, please state, say your  
7 full name and spell your name for the court reporter  
8 so that we can get an accurate transcript of  
9 tonight's meeting.

10 With that, I have a list of folks who  
11 were logged into the queue and put their name in  
12 first. So we'll run through that list of folks to  
13 start this off. And the first person in the queue  
14 this evening is Mr. Rob Simpson. The person that is  
15 up next would be Jeff Rubin.

16 So I ask Rob Simpson to please come  
17 off mute and provide your comments. Bear with us  
18 Rob, we'll get to that button to ask you to come off  
19 mute in just a second.

20 MR. SIMPSON: Thank you. Thank you,  
21 Jeff. Thank you to OCIDA for holding this public  
22 hearing. Thanks to everyone for joining. I just  
23 want to start off by saying in my eighteen years in  
24 economic development in Upstate New York, the  
25 opportunity that the marketplace is providing to our

1 5-24-2021 - SEQRA Hearing

2 region right now is one that I have never seen  
3 before. It's one that I'm incredibly excited about  
4 and it's one that I think our region needs to  
5 position itself to capture. We know that there are a  
6 handful of very significant and very exciting  
7 potential investments that are being considered by  
8 global technology companies around the world. And  
9 for years and years, our region has talked about a  
10 complete and total transformation of our Central New  
11 York economy. By positioning the White Pine Commerce  
12 Park to attract one of these perspective large scale  
13 investments, we have the -- we have the possibility  
14 of creating and attracting not only new direct  
15 investment, but new jobs. Those jobs would be  
16 directed by an employer who might come and choose to  
17 locate at White Pine, but also a litany of indirect  
18 jobs.

19 Supply chain jobs, small businesses  
20 who have the, would have the ability to work with a  
21 prospective tenant if we're successful in landing one  
22 in the park, thousands and thousands of good paying  
23 construction jobs, something that our community cares  
24 a lot of. And also all of the potential supply chain  
25 benefits that follow investments on the order of

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2 magnitude that those that our region is chasing.

3 This would be nothing short of a complete and total  
4 transformation of essentially our economy from a  
5 postindustrial one to one that is anchored in  
6 technology, in innovation, in advanced manufacturing.  
7 And it's an incredibly exciting time.

8 One thing I would say about the size  
9 and scale of the investments that are out there in  
10 the marketplace today, they would do a number of  
11 things that I think are critically important. First  
12 and foremost, positioning ourselves to attract one of  
13 those investments would put Syracuse back on the  
14 international map.

15 Second, we will draw a significant  
16 amount of additional attention which allows us to be  
17 more competitive from an economic development  
18 standpoint. It would serve as a beacon to attract  
19 people and talent from across the country and around  
20 the world to choose Central New York to locate. And  
21 -- and it would also offer us the opportunity for  
22 downstream spin off technology jobs in high tech  
23 startups and others that we could support throughout  
24 our technologyecosystem.

25 Put simply, this is a once in a

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2 lifetime opportunity for us to create an asset in the  
3 White Pine Commerce Park making position in Central  
4 New York for one of the largest economic development  
5 investments that is out there in the market. On  
6 behalf of the two thousand members of CenterState  
7 CEO I want to thank the county for their leadership  
8 role and I want to offer our unequivocal support for  
9 this project. Thank you.

10 MR. DAVIS: Thank you. Then next will  
11 be Jeff Rubin and on-deck after that will be Luke  
12 Murphy.

13 MR. RUBIN: Thank you. Thank you,  
14 Jeff. My name is Jeff Rubin, J-E-F-F R-U-B-I-N, the  
15 founder and CEO of Sidearm Sports as well as a  
16 professor of practice at the School of Information  
17 Studies at Syracuse University.

18 I want to talk about this project and  
19 the impact it will have and by doing that, I want to  
20 talk about Sidearm Sports. When we have non-tech  
21 jobs, we fill those on average it takes us two weeks  
22 to fill non tech jobs. Those can be in project  
23 management, sales etcetera. Our tech jobs are taking  
24 four plus months to fill on average. And this is  
25 getting worse as the pandemic ends. We're in the

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2 midst of what I'm calling the great migration, where  
3 there are promises of remote jobs, which means  
4 companies like us in Central New York are no longer  
5 competing with just other companies in Syracuse for  
6 tech jobs, we are competing with companies all over  
7 the country.

8 These companies -- these companies are  
9 promising remote work for at least a year, and then  
10 potential relocation. We've made great strides in  
11 Central New York and in Onondaga County on creating  
12 and growing tech companies, but we're nowhere close  
13 to where we need to be. The opportunity we're  
14 discussing today, as Rob Simpson said, has the  
15 ability to put our county on the map as a tech  
16 destination. It has the opportunity not just to add  
17 thousands of jobs, but has the ability to add jobs to  
18 tech companies like Sidearm Sports. So on behalf of  
19 Sidearm Sports, I urge your approval of this  
20 environmental impact statement. Thank you.

21 MR. DAVIS: Thank you. Again, anybody  
22 that wishes to speak, please put your name in the  
23 chat function. We will collect your name. Luke  
24 Murphy is up to speak and will be asked to unmute  
25 after Luke will be Bud Loura.

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2 MR. MURPHY: Hello everyone, my name  
3 is Luke Murphy L-U-K-E M-U-R-P-H-Y. I'm in charge of  
4 the Research Department at Inficon and we directly  
5 deal with this industry. I think as Rob and Jeff  
6 said we're in a unique situation here to basically  
7 change the course of Syracuse for the rest of my  
8 lifetime, my kids' lifetimes. I mean, being  
9 fortunate enough to have traveled the world, I've  
10 seen what the semiconductor fabs can do. And it's  
11 just an immense amount of people that come in high  
12 paying jobs, right that then go off and buy houses or  
13 build houses and all the supply chain things that go  
14 with that. And I think that this is something that  
15 is a once in a lifetime opportunity, right. I mean  
16 this is going to attract people, it's going to keep  
17 Syracuse relevant. On a personal note, I mean I'm  
18 born and raised in Liverpool right in the village, I  
19 remember the heydays of when the Lockheed Martin  
20 parking lot was full. And I feel this has, this has  
21 the game changer ability to do that to the Syracuse,  
22 New York area in general. And I urge the committee  
23 to approve this. I will say also my colleague, Ann  
24 is on the line, I don't know if she has anything else  
25 to add. But thank you again and I urge the committee



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2 to approve this.

3 MR. DAVIS: Thank you, Luke. Next up  
4 is Bud Loura, and on-deck will be Randy Wolken.

5 MR. LOURA: Hello everybody, Bud  
6 Loura, B-U-D L-O-U-R-A. I own a restaurant  
7 consulting company in Central New York. I work with  
8 about a hundred and twenty five to hundred and thirty  
9 of your, all your favorite local restaurant owners.  
10 As everyone knows, that industry has probably been  
11 hit the hardest in the last fifteen months. I've  
12 spoke to them after speaking to Nancy and some of the  
13 people in charge of this project and they are  
14 overwhelmed with the positivity, the opportunity.  
15 Bringing in tech jobs, jobs that pay significant, the  
16 ancillary benefits of that will be really hit the  
17 restaurants extra as you know now, a lot of  
18 restaurant owners are missing employees. They're  
19 understaffed. This can bring in high school kids,  
20 kids going to college, a whole new brand, and group  
21 of people that can be employed. The businesses that  
22 can come in will add revenue to all of these local  
23 restaurants. I've got already commitments from forty  
24 five to fifty that would be more than willing to  
25 endorse this project one hundred percent. We see it

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2 as positive. We hope to do and, and anything that's  
3 needed in the process, we'd be available to help. So  
4 again we, we endorse this fully, and we appreciate  
5 the opportunity to speak. Thank you.

6 MR. DAVIS: Thank you for your  
7 comments. Again, Randy Wolken and on-deck from Randy  
8 it will be, just a second, Maureen Matthews.

9 MR. WOLKEN: Good evening, my name is  
10 Randy Wolken, W-O-L-K-E-N. And I'm President CEO of  
11 MACNY the Manufacturers Association. We represent  
12 over three hundred manufacturing and industrial  
13 companies in a twenty six county region. And this is  
14 a fantastic opportunity to expand and grow our  
15 advanced manufacturing base. I want to thank the  
16 County Executive and his team OCIDA, and beyond for  
17 developing this absolutely outstanding opportunity  
18 and we fully support the expansion of the White Pine  
19 Commerce Park.

20 As mentioned by others already on  
21 this, at this event, there is a spectacular  
22 opportunity to grow really unseen for decades in this  
23 region. Not only will it grow the base of  
24 opportunity, it will help existing companies expand.  
25 And that is really the opportunity. So we fully

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2 support this effort, by hoping it will go forward,  
3 and we're -- appreciate the opportunity to make this  
4 comment. Thanks.

5 MR. DAVIS: Thank you for your  
6 comment. Maureen Matthews is up now, and on-deck  
7 will be Alberto Bianchetti, Bianchetti. Maureen,  
8 just bear with us, we'll ask you to unmute in just a  
9 second. Maureen, we need to locate your screen name  
10 to ask you to unmute just, just a moment.

11 MS. MATTHEWS: I'm Maureen Matthews,  
12 M-A-T-T-H-E-W-S. I'm a resident of Burnett Road,  
13 and I'm in jeopardy of losing my home. And I want to  
14 know what was the basis for the review on such a  
15 large parcel, for example, who or what business did  
16 you mirror? Are there other structures in upstate  
17 New York that are four million square feet on one  
18 point nine, that's an estimate square miles? Did  
19 you mirror a business in another state? Did you  
20 mirror a business in another country? I have  
21 concerns of the business pulling out as with Pfizer  
22 in Connecticut and Foxconn in Wisconsin. I am  
23 deeply concerned and opposed to a mega development.

24 MR. DAVIS: Thank you, Maureen. Next  
25 up is Alberto, and on-deck will be Mary Snyder.

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2 MR. BIANCHETTI: Good evening, my name  
3 is Alberto Bianchetti, A-L-B-E-R-T-O B as in boy, I-  
4 A-N-C-H-E-T-T-I. I'm National Grid's regional  
5 director of customer and community engagement for  
6 Central New York. National Grid has a long history  
7 of supporting economic development throughout New  
8 York State, including significant support for  
9 projects in Onondaga County. The goal of that  
10 support is to be a -- a partner in the vitality of  
11 communities we serve both by sustaining economic  
12 activity and helping it grow. That effort benefits  
13 all customers of National Grid and all residents by  
14 increasing the utilization of assets we have built to  
15 date, and those we will need to develop in the  
16 future. Because of the significant assets National  
17 Grid already has near the White Pine site, we believe  
18 that White Pine is uniquely suitable for the  
19 development of a high tech manufacturing facility  
20 where the availability and reliability of  
21 competitively priced energy utility service is a high  
22 priority.

23 Other attributes such as its potential  
24 size, location, and the capabilities of the regional  
25 workforce, area colleges and the local manufacturing

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2 base, also make the site highly competitive with  
3 locations in the south and southwest regions of the  
4 country. The potential for massive investment by a  
5 high tech facility has the chance to be  
6 transformational to the region for a generation,  
7 bringing with it significant economic multiplier  
8 effects and well-paying jobs. National Grid has  
9 similarly supported sites in Saratoga, Oneida and  
10 Genesee counties that have already seen impactful  
11 plans and investments by computer chips and high tech  
12 facilities. For these reasons we support the  
13 development of the White Pine site with the  
14 confidence that its build out will be done in  
15 accordance with the environmental and regulatory  
16 expectations of all governing authorities. And the  
17 belief that its success will benefit Onondaga County  
18 and the region as a whole. Thank you.

19 MR. DAVIS: Thank you. Next up is  
20 Mary Snyder, you'll be asked to unmute in just a  
21 second. And on-deck is Mitch Latimer.

22 MS. SNYDER: Thank you for the  
23 opportunity to speak tonight. I am Mary Snyder,  
24 that's spelled M-A-R-Y S-N-Y-D-E-R. I'm general  
25 counsel with S.R.C. in North Syracuse, and I'm here

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2           representing S.R.C.  Our organization responds to  
3           rapid requests from the US military board for troop  
4           protective material.  And weekly we receive briefings  
5           on the status of procurements that support those  
6           government contracts.  And one of the items that most  
7           concerns us is semiconductors.  Because of the  
8           limited availability right now in the United States,  
9           we are constantly concerned that we may not be able  
10          to deliver the troop protective material within the  
11          government's required timeframes.  And so it's our  
12          belief that the -- the community in Central New York  
13          can either be hurt by this shortage or over the long  
14          term could be helped by the shortage.

15                       So -- so we believe this is a growing  
16          important industry and we'd like to see it develop  
17          here in Upstate New York and be part of our  
18          technology infrastructure here.  So we think this  
19          would be an important development.  Speed is very,  
20          very critical in the industry, and the organizations  
21          that will be interested in relocating here will need  
22          to move quickly and the G.E.I.S. statement will  
23          G.E.I.S. plan will support that speed.  So we -- we  
24          endorse the proposal and thank you for the  
25          opportunity to speak tonight.

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2 MR. DAVIS: Thank you for your  
3 comments. Next up is Mitch Latimer, on-deck is Mike  
4 Nash.

5 MR. LATIMER: Good evening everyone,  
6 my name is Mitch Latimer, M-I-T-C-H L-A-T-I-M-E-R. I  
7 just wanted to say that as a resident of Liverpool, I  
8 am in support of this project. To put this site  
9 ahead of the rest that we hear about coming to the  
10 area. I feel that if we don't come together as a  
11 community, we might not see an opportunity like this  
12 again in our lifetime. For years people of Central  
13 New York have talked about businesses like the Nestle  
14 Plant, the Carrier Corporation leaving New York along  
15 with them left the families that work there looking  
16 for similar jobs, in other areas and other states.  
17 It's time for in Central New York to get business  
18 back -- businesses back like the Amazon is not far  
19 from the White Pine site. Businesses like these are  
20 offering job opportunities to thousands of people.  
21 Let's make Central New York a destination to live and  
22 work for our families and our friends. Thank you to  
23 the County Exec Ryan McMahon and OCIDA for bringing  
24 opportunities like this to our area.

25 MR. DAVIS: Thank you for the



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2 comments. Next up is Mike Nash, and on-deck will be  
3 Erik Smith.

4 MR. NASH: Thank you, appreciate you  
5 having me. My name is Mike Nash, M-I-K-E N-A-S-H.  
6 I'm the President of KS&R in our we are a local  
7 market research firm, consulting agency here in  
8 Syracuse, New York. We specialize in technology  
9 clients. We do work for a number of semiconductor  
10 chip fab manufacturers. I think that's the way the  
11 economy is rolling right now. I think this  
12 opportunity is, is a positive one for many of the  
13 reasons stated earlier. And I would just add the  
14 whole idea of reshoring or, or onshoring back with  
15 this type of manufacturing will support a number of  
16 industries that were probably not even aware of  
17 today.

18 I think the auto industry is hurting  
19 right now because of some of the chip manufacturing,  
20 like the phone industries are going to start hurting  
21 as well. And I think the more that we can put back  
22 into the United States, particularly Syracuse,  
23 Onondaga County area, the better. And we will highly  
24 support this opportunity to continue to build this  
25 technology ecosystem. And the ... between the Amazon

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2 build out between Route 91 between this particular  
3 parcel here, I think we have a great momentum moving  
4 here that, that can all come together in a positive  
5 way. So we support this board. Thank you.

6 MR. DAVIS: Thank you for the comment.  
7 Next up is Erik Smith and on-deck is Andy Breuer.

8 MR. SMITH: Thank you. This is Erik  
9 Smith E-R-I-K S-M-I-T-H and I'm the president and CEO  
10 of Saab Incorporated headquartered in Syracuse. Saab  
11 is a US aerospace and defense company, and we use a  
12 significant amount of advanced semiconductor  
13 components in manufacturing systems and subsystems  
14 for delivery around the world. While I can't speak to  
15 the specifics of the challenging land issues before  
16 you today, I can tell you that overall, I believe  
17 this project has the potential for exciting economic  
18 growth for our community.

19 I also see a specific benefit for  
20 Saab. This project will provide a local supplier and  
21 partnership opportunity for key components within our  
22 domestic and global supply chain. Having a local  
23 trusted supplier to improve our market opportunities,  
24 and will reduce the time to market for our products.  
25 If successful, this project will help the region

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2 attract directly relevant talent and improve the  
3 competitiveness of the greater Syracuse area in  
4 recruiting that talent. Landing a large high tech  
5 company at White Pine will undoubtedly cause  
6 additional companies to look seriously at Syracuse,  
7 just as Saab did when we decided to make Syracuse our  
8 home base.

9 So I was committed to Syracuse. We  
10 moved our US headquarters here in 2019. And we see  
11 the value in a grow -- in growing this high tech  
12 ecosystem that drives economic value for all  
13 industries locally. Just like at Saab you can expect  
14 the jobs associated with this project to be good  
15 paying high tech jobs. That means more restaurant  
16 patrons, more sales for retail, our customers across  
17 our service industries, and it means more revenue  
18 back into our local economy and more opportunities  
19 for our citizens. I know there are many  
20 considerations to weigh when considering a project of  
21 this magnitude. I'm truly not an expert in most of  
22 them. However I can assure you that should you  
23 approve this project, it will significantly grow our  
24 local economy now and signal to other high tech  
25 companies like Saab that Syracuse is a great place

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2 for a company to call home. I strongly support this  
3 project. Thank you for your time.

4 MR. DAVIS: Thank you for your  
5 comment. Next up is Andy Breuer, and on-deck is  
6 Darlene Piper.

7 MR. BREUER: Good evening, Andy  
8 Breuer, B-R-E-U-E-R. I'm president of Huber Breuer  
9 Construction Company, we're on the south side of the  
10 city of Syracuse. However we work throughout the  
11 county and throughout Central New York. In my role,  
12 I represent hundreds of union and non-union  
13 tradesmen, who would all benefit from the  
14 construction of a high end precision manufacturing  
15 facility at this site. And in my role, I not only  
16 rep the construction industry, but I also overlap  
17 often with the design, the engineering and the real  
18 estate development community. One thing that all of  
19 these sectors have in common is the better we all do  
20 our jobs, the faster we work ourselves out of work.  
21 There were very few new construction starts during  
22 the pandemic. So as a community, we should be  
23 embracing every opportunity to bring  
24 tangible development, new employment, and especially  
25 precision manufacturing jobs back to Central New

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2 York.

3 In addition to the direct benefit of  
4 constructing a new facility or new infrastructure at  
5 White Pine, there's the indirect benefit that comes  
6 from a significant influx of new workforce, for  
7 instance, new housing opportunities. It goes without  
8 saying the county has dedicated years of preparation  
9 to position the White Pine site for these major  
10 opportunities and you know, the cost of doing  
11 business in New York State remains tremendously high.  
12 It's often a detractor to corporate investment in our  
13 state and in our region. This site is a  
14 differentiator. It makes our region competitive and  
15 attractive to corporate investment, to have a major  
16 three hundred acre plus site and essentially shovel  
17 ready for high tech development is a tremendous asset  
18 and opportunity for the Central New York Community.

19 A new high tech development at White  
20 Pine would result in a continuity of employment for  
21 the construction, construction sector, would result  
22 in new tax revenue for our local government to result  
23 in a local multiplier effect of employee payroll and  
24 support services that would cycle throughout our  
25 local economy. So I urge ... to embrace this

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2 opportunity to approve the environmental impact  
3 statement so that the county can continue to attract  
4 quality job growth and development at this site.  
5 Thank you very much to the OCIDA Board.

6 MR. DAVIS: Thank you for the comment.  
7 Next up is Darlene Piper, on-deck is Hannah Henley.  
8 And anybody that wishes to speak, please put your  
9 name in the chat function. Thank you

10 MS. PIPER: Hi, my name's Darlene  
11 Piper, can you hear me?

12 MR. DAVIS: Yes, I can.

13 MS. PIPER: Okay. Because that's my  
14 problem with this meeting. My name is Darlene Piper  
15 D-A-R-L-E-N-E P-I-P-E-R. It's on a Zoom call, I'm  
16 using my daughter's computer because we don't have it  
17 at home. Governor Cuomo had these setup so they,  
18 there's no in person meetings. However times have  
19 changed very rapidly, and I believe this meeting  
20 should have been public in a public place, and  
21 meeting face to face. I am the thirteenth speaker,  
22 and I've noticed one other person is opposed to this  
23 project, and I would gather then a lot of that is due  
24 to the fact of the ability to do a zoom meeting.

25 I would also like this board to stop

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2 referring to this park as White Pines Development or  
3 Park or whatever it's referred to, it is not, now  
4 it's now pretty white pines and will be destroyed and  
5 replaced with fifty acres of parking lot and not to  
6 mention a huge building. I don't believe you are  
7 informing the residents of Cicero and Clay of what's  
8 going to be in this park, in this development.  
9 Everybody's talking about the potential of all these  
10 great jobs and all this things that will happen. I  
11 think the development and the money is going to be in  
12 building it. And then you pray and hope somebody is  
13 going to move in. But that's not a guarantee. Look  
14 at Foxconn in Wisconsin, they left. Where is  
15 Carrier, they left. Where is Miller and G.E., and  
16 Chrysler, they all left. That's what I feel is going  
17 to happen here, they're going to leave, and then  
18 we're left with this huge monstrosity of a complex  
19 that no one knows what to do with.

20 There are other areas that you do not  
21 need to use Burnett Road. You can make a smaller  
22 complex, you can go to one of those abandoned places  
23 and use that instead of wrecking and ruining a place  
24 that already has beautiful water. And that's the  
25 other issue I have is how it's going stream right



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2 into Oneida River and then Oneida Lake. And you're  
3 going to tell me that all those protections will be  
4 in place. And I don't believe they will. So I  
5 oppose this project, vehemently. Thank you.

6 MR. DAVIS: Thank you for your  
7 comment. Next up is Hannah Henley, and on-deck is  
8 Craig Marcinkowski on the phone

9 MS. HENLEY: Okay. Good evening  
10 everyone, my name is Hannah Henley and I've worked at  
11 Inficon in east Syracuse for the past eleven years.  
12 Currently I'm in the role of V.P. marketing at  
13 Inficon. I came to Central New York by way of  
14 Clarkson University. But to be honest, it was  
15 completely by chance. Originally from New Hampshire  
16 when I received the job offer from Inficon, I was  
17 really skeptical about my long term career growth  
18 opportunities in Syracuse. I did make the decision  
19 to come to the region because I was intrigued by the  
20 technology Inficon develops and its global footprint.  
21 But I thought I could only stay for a couple of  
22 years. I've been really fortunate to grow in my  
23 career here at Inficon, but I've seen so many people,  
24 colleagues and classmates have to go elsewhere.

25 Recruiting and retaining tech talent

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2 is a challenge for Inficon. There was someone that  
3 mentioned several months trying to fill a position,  
4 some positions at Inficon we've spent several years  
5 trying to fill. We serve the semiconductor market  
6 with sensors and software for smarter manufacturing.  
7 Chip makers are mine and Inficon's customers. We  
8 have firsthand experience with the type of jobs such  
9 complex manufacturing requires. It really is from  
10 the technician level to PhD scientists. It takes  
11 the full gamut to run the fab. They're the world's  
12 innovators and their chips drive technology that  
13 enable safer healthcare, sustainable agriculture,  
14 electric vehicles and transportation, solar  
15 production and storage and the future of low power  
16 devices and batteries that will enable a more  
17 sustainable planet.

18 In addition, I also want to comment on  
19 a unique experience that I have. The majority of my  
20 time at Inficon has been serving foreign customer  
21 demand for our technology, where they're building  
22 leading fabs. These are built primarily in Korea,  
23 Taiwan and China. This is the first time in my  
24 working career I've seen the U.S. take the steps to  
25 again become a leader in I.T. fabrication. I think

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2 it would be an immense sense of pride for our region  
3 to support the semiconductor innovation. In  
4 addition, these types of chips are critical for our  
5 supply chain stability and even national security. We  
6 have an opportunity to steer the future of this  
7 industry and drive a brighter future for our local  
8 economy. And I offer mine and Inficon's support of  
9 the project. Thank you.

10 MR. DAVIS: Thank you for the comment.  
11 Next up is Craig Marcinkowski and on-deck is Greg  
12 Lancette.

13 MR. MARCINKOWSKI: Craig  
14 Marcinkowski, Senior Vice President Fotokite, M-A-R-  
15 C-I-N-K-O-W-S-K-I. We're a local tech startup. We  
16 make drones, and we make them for first responders.  
17 We came out of the genius New York program in 2018.  
18 We're Swiss based, but ninety percent of our business  
19 is in North America. We recently just moved one  
20 hundred percent of our production of these systems to  
21 Upstate New York. That's something you really  
22 wouldn't have thought five years ago, pretty much he  
23 always said all drones will be made in China, and  
24 there's been a big shift happening. We'll -- we'll  
25 hopefully if we continue to execute on our plan be

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2 the most flown system for public safety within two  
3 years. We're flown every day in the United States  
4 today, and we're flown around the globe, we're  
5 shipping all the systems out of here.

6 We're about to double in size over the  
7 next year as we close our series B round of funding  
8 in the next month. And we're really excited to be in  
9 Central New York and growing here. We're also  
10 extremely supportive of this project, because  
11 semiconductors, microcontrollers are major core  
12 components of our systems and of our new systems  
13 going forward that fly every day, helping first  
14 responders save lives. And we are like everyone  
15 experiencing lots of thanks in that space. We're  
16 spending large amounts of capital to secure  
17 components so we can build. So we're incredibly  
18 supportive of what's happening with this project,  
19 building out this capability here locally.  
20 Additionally, we're going to be doubling our  
21 workforce here over the next twelve months. And the  
22 talent that's going to be coming into the region as  
23 we continue to grow as part of this project is  
24 exactly what we're looking for. So we give  
25 unwavering support behind this project, and, and urge

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2 swift approval of the G.E.I.S. for the site.

3 MR. DAVIS: Thank you for the comment.

4 Next up is Greg Lancette and on-deck is Jim Mason.

5 MR. LANCETTE: Good evening, my name  
6 is Greg Lancette, L-A-N-C-E-T-T-E. I am the  
7 President of the Central and Northern New York  
8 Building and Construction Trades Council. We have an  
9 opportunity in Onondaga County as many others have  
10 spoken, on the potential game changing that would be  
11 multigenerational if the site was selected for some  
12 of this fabrication and the leading technology that  
13 comes with that. You know, a large portion of the  
14 fifty six hundred members that belong to the Building  
15 Trades Council, they actually have to travel to where  
16 the construction is. And I ask that this project  
17 continue to move forward by expanding the White Pines  
18 Business Park. Many of our members have been working  
19 at IBM Fishkill, Global Foundries in Malta, which is  
20 Saratoga County, of course, Quincy, SUNY, I.T. and  
21 Cree and neighboring counties, and even some of them  
22 travel as far as Phoenix, Arizona to work on Intel  
23 facilities when they are being built and renovated.

24 So I would like to thank Jeff, OCIDA  
25 and everyone else facilitating this necessary and

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2 appreciated function of good government. And I do  
3 encourage that we keep moving the ball forward.  
4 We're on four decades now with this parcel that has  
5 been intended and well positioned for very good  
6 growth for our industry and also for our region. So  
7 thank you. The Building Trades Council does support  
8 moving forward with this project. Thank you,  
9 everybody.

10 MR. DAVIS: Thank you for the comment.  
11 Next up is Jim Mason and on-deck is Mary M. Thompson.

12 MR. MASON: Good afternoon, I'm Jim  
13 Mason, M-A-S-O-N. I'm the Business Manager for  
14 the North Atlantic States Regional Council of  
15 Carpenters and the President of Local two seven  
16 seven. I represent roughly twenty seven hundred  
17 members in Central New York. To echo on top of what  
18 Greg has said speaking with the building trades, this  
19 project's estimated to bring four thousand good  
20 paying jobs into our area. In addition to this will  
21 be the hundreds of jobs created through each phase of  
22 construction on the site. This will make it possible  
23 for us and other trades to recruit new apprentices in  
24 our programs and give the opportunity to young people  
25 that may not intend to go to college the chance to

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2 learn a trade that will lead to a lifelong career.

3 And for this reason we support this project.

4 MR. DAVIS: Thank you for the comment.

5 Next up is Mary M. Thompson. On-deck is Ray Rudolph

6 and John W. Danforth.

7 MS. THOMPSON: Thank you. Good

8 evening, my name is Mary Thompson, T-H-O-M-P-S-O-N.

9 I'm the Executive Director of the Home Builders and

10 Remodelers of Central New York. And on behalf of the

11 businesses who are members of our association, I'm

12 here to offer our support for the development of the

13 project and the jobs that it will bring to our

14 region. When a community is given a growth

15 opportunity like this obviously it improves

16 residential construction. Homes are where jobs go at

17 night. So I'd like to offer a few statistics to help

18 you better understand the ripple effect in our

19 economy of the high tech manufacturing jobs that will

20 bring our -- bring to our community through the

21 growth of the residential construction industry.

22 The estimated one year impact of

23 building one hundred single family homes in a typical

24 local area include twenty eight point seven million

25 dollars in local income, three point six million in



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2 taxes and other revenues for local governments, and  
3 three hundred and ninety-four local jobs. The  
4 additional annually reoccurring impacts of building  
5 one hundred single family homes in a typical local  
6 area are four point one million in local income, one  
7 million in local taxes and sixty-nine local jobs.  
8 Those are ongoing annual local impacts that result  
9 from new homes becoming occupied and the occupants  
10 paying taxes and otherwise participating in the local  
11 economy year after year.

12 The estimated one-year impact of  
13 building a hundred rental apartments eleven point  
14 seven million in local income, two point two in taxes  
15 for local government, a hundred and sixty one local  
16 jobs. And again, that reoccurring annual impact of a  
17 hundred apartments, two point six million in local  
18 income, five hundred and three thousand in taxes for  
19 local governments and forty-four local jobs. The  
20 estimated impact of one million dollars spent on  
21 residential remodeling in a typical area eight  
22 hundred and forty one thousand in local income,  
23 seventy-seven thousand in taxes for local governments  
24 and thirty-one local jobs.

25 So as you can see, the ripple effect

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2 of a project like this for residential construction  
3 on local income taxes and jobs is enormous. The  
4 businesses in the residential construction industry  
5 stand ready to build, improve and maintain the  
6 housing stock for our neighbors in Central New York  
7 and to help our region grow and prosper with the  
8 economic development growth that this project would  
9 bring if it moves forward. We fully support it.  
10 Thank you for your time.

11 MR. DAVIS: Thank you for the comment.  
12 Again, if you'd like to make a statement, please  
13 enter your name in the chat function. If you're on  
14 the phone, please hit star nine to raise your hand.  
15 We're collecting those phone raise, folks that are  
16 raising their hands. We are seeing you. So again  
17 next up is Ray Rudolph. And it says John W.  
18 Dansworth, and on-deck is Rick Short.

19 MR. RUDOLPH: Thank you very much, Mr.  
20 Davis. Again, it's Ray Rudolph, R-U-D-O-L-P-H. I'm  
21 a member of the Board of Directors of John W.  
22 Dansworth Company, a large mechanical construction  
23 company in Dewitt. Why is this project important to  
24 us as a company, as some of the trades folks spoke  
25 to, it's going to create a lot of short-term jobs,

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2 but that's not our primary motivation. We may get  
3 some of the work, we may not get some of the work but  
4 in the short term, the bigger play for us, and the  
5 play that personally I -- I think is most important  
6 is the fact that this project could, can transform an  
7 economy I've seen it in the Capital District, I've  
8 seen it in the other geographies other speakers have  
9 spoken about. It's more of the long term play the  
10 fact that advanced manufacturing is no longer a fad.

11 There was certainly a concern when it  
12 first popped onto the scene in the states that that  
13 it was in fact sustainable. It's proven to be  
14 sustainable. And it appears as the gentleman from  
15 National Grid so aptly pointed out a link in the  
16 chain from advanced manufacturing, Buffalo,  
17 Rochester, this project in Syracuse, Cree and Utica,  
18 global foundries in the Albany area, it creates even  
19 more sustainability in that type of manufacturing.

20 I mean, if there's any question,  
21 there's three thousand microchips in the average car  
22 that's produced in America now. And a lot of people  
23 probably don't even know there's a chip, you know.  
24 So when you think that three thousand is needed for  
25 the car you're driving around, it's pretty -- pretty

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2 astounding number. Beyond the impact of John W.  
3 Danforth is personal to me. I am a native of Central  
4 New York. When we drove 90 as a kid, Carrier and  
5 G.E. parking lots were full, you go west to Kodak,  
6 that was full, Griffis was full. It wasn't a  
7 question of whether my dad was going to work. It was  
8 where he was going to work. A project like this will  
9 in conjunction with the other projects going on along  
10 the 90, a project like this is going to provide the  
11 glue along the 90 to put all our families in a  
12 position to be able to say that once again. Thank  
13 you very much for your time, and we as a company very  
14 much endorse the advancement of this project.

15 MR. DAVIS: Thank you for your  
16 comment. Next up is Rick Short, on-deck is David  
17 Wilhite.

18 MR. SHORT: Thank you very much. My  
19 name is Rick Short, R-I-C-K S-H-O-R-T. I am a  
20 corporate associate, Associate Vice President at the  
21 Indium Corporation, in the Utica, New York area.  
22 Indium Corporation supplies and services some of the  
23 world's leading technology companies names like  
24 Intel, Apple. Our more than one thousand employees  
25 manufacture electronics assembly materials and supply

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2 them worldwide. A major semiconductor investment  
3 envisioned for the White Pine site has the potential  
4 to be very beneficial to our company and to our  
5 region. Just as we see in the SUNY poly campus  
6 development in Marcy, New York our customers and  
7 potential customers are moving next door to our  
8 global headquarters and several of our Central New  
9 York factories. We've benefited from your  
10 construction workers traveling from the Syracuse area  
11 to build our Quad C SUNY poly facilities out here in  
12 Oneida County. These two international high tech  
13 manufacturing companies are now in the process of  
14 changing our economy. Cree Wolfspeed currently  
15 building and soon to be equipping the world's largest  
16 silicon carbon device manufacturing facility to  
17 support the exploding electric vehicle market.

18 They're already hiring and training  
19 their staff ... just secured the position directly  
20 out of Marbella Community College with Cree WolfSpeed  
21 And ... has recently begun shipping power modules  
22 that use advanced stem technology to reduce  
23 electricity consumption by over thirty percent.

24 Unlike the previous speakers, our  
25 business doesn't expect to see improvement in our

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2 county. We do see improvement from the investment  
3 similar to what you're talking about that have  
4 happened in Oneida County. We enjoy new sales to  
5 newly located customers, enhance service levels  
6 provided by nearby major customers, enhanced training  
7 and education opportunities which is produced by a  
8 critical mass of STEM professionals moving into our  
9 area, an improved vendor base increased material  
10 availability. Reduced lead times, better service,  
11 existing vendors benefiting from this as well.  
12 Enhanced talent relocating to our area including  
13 spouses, improved ease of attracting talent, options  
14 for spouses to work when we bring talent into the  
15 area, enhanced employee retention due to better  
16 climate for professionals and families and improved  
17 service at Syracuse Airport.

18 For our community, here's what's  
19 happened. My real estate development friends told me  
20 that there is not one single loft apartment left  
21 available for rent in the city of Utica. And my  
22 personal realtor tells me they can sell my house the  
23 same day I list it, whether it's in the city or the  
24 suburbs. I'm sure that you'll enjoy many of the same  
25 benefits. Thank you very much.

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2 MR. DAVIS: Thank you for the comment.

3 Next up is David Wilhite, and on-deck is Lydia  
4 Pierce.

5 MR. WILHITE: A good -- goodevening,  
6 everyone. So we have the Endless Frontier bill on  
7 the Senate floor, you know a hundred billion dollar  
8 bill, I think it may have been reduced to twenty nine  
9 billion to bring jobs, you know, potentially into the  
10 State of New York. There's a lot of funding out  
11 there you know, for this -- for this project. And  
12 you know, I'm all about you know, economic  
13 development and economic prosperity of Onondaga  
14 County and Syracuse. But what I do have a problem  
15 with is the use of eminent domain to make it  
16 possible. I live right across the street from  
17 Maureen Matthews, who was just on, Darlene Piper  
18 spoke as well. And, you know, there's thirty five  
19 plus residents on Burnett Road, who are going to be  
20 displaced because of this. Some of these folks you  
21 know, their husband built the house. They don't have  
22 anywhere else to go and, you know, built the house  
23 back in the sixties, you know. Some of these folks  
24 just don't have the financial, you know, fortitude to  
25 take this kind of impact.



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2 What I ask OCIDA to do is look at the  
3 alternatives. To see if there's other alternatives  
4 that we can approach like, the land south of State  
5 Route 31. Has anyone talked about potentially  
6 building a bridge and developing the land south of  
7 31. I mean it doesn't have to be extremely  
8 contiguous. I know it would, it would probably be  
9 better if it was, but there are other alternatives  
10 and move north of the easement. Just, let's just  
11 look, you know, do we need twelve hundred and fifty  
12 three acres. Do we need to displace Burnett road to  
13 make this possible. And, you know, has a medium  
14 sized project in the you know, realm of eight hundred  
15 to nine hundred acres been explored. And you know,  
16 there's four hundred acres of surface disturbance  
17 talked about in the GIS, you know, four hundred  
18 million square foot industrial area under roof. You  
19 know, is that in one location, or is there a lot of  
20 different facilities spread out over that twelve  
21 hundred and fifty three acres? Do we even have a  
22 site plan?

23 And, you know, the, I think Darlene  
24 Piper spoke about the environmental impacts. It's  
25 definitely going to go into Young's Creek, Oneida

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2 River and Oneida Lake, we need to look at those  
3 impacts. And, you know, it's definitely going to be  
4 an MS4, they're going to have to include that, the  
5 whole park in the MS4. And, you know, I think this  
6 should go through all the environmental comment  
7 process before eminent domain is claimed on Burnett  
8 Road and the Nazarene church with which they spelled  
9 out specifically in the GIS. And thanks, Jeff,  
10 appreciate -- appreciate the opportunity to speak.  
11 You know, I really do want the best thing for the  
12 community. I just want to look at different  
13 alternatives. Thank you.

14 MR. DAVIS: Thank you for your  
15 comments. Next up is Lydia Pierce, and on-deck is  
16 Ryan Pleskach.

17 MS. PIERCE: Hi, I'm Lydia Pierce.  
18 Can you guys hear me?

19 MR. DAVIS: Yes, I can.

20 MS. PIERCE: Okay. I've lived in ...  
21 since '77. I have systematically seen Onondaga  
22 County destroy the Town of Clay. I lived there from  
23 1981 to 2018. And left because of the stuff that  
24 goes up, that's going on there now, that has gone on  
25 there in the past. I am against this project, not

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2 because it's a chip manufacturer or it's high tech or  
3 whatever. It's just -- it's the town -- in the Town  
4 of Clay there's just -- it's not a good place to put  
5 it. There's too much stuff there already. There's,  
6 there's, there's no more room in that town. I invite  
7 everybody that's spoken previously on this call, I'm  
8 talking about the professional people. Why don't you  
9 move to the Town of Clay and let them put a  
10 semiconductor factory next to you. And you've -- you  
11 would see how fast you would oppose it. I live far  
12 away from -- from there now in Central Square area,  
13 because it's peaceful. But it -- this is going to  
14 impact me because I live in the Oneida Lake  
15 watershed. So I feel that they need to find another  
16 place to put this. Thanks for letting me comment.

17 MR. DAVIS: Thank you for your  
18 comment. Next up is Ryan Pleskach, and on-deck is  
19 Barb O'Brien.

20 MR. PLESKACH: Good evening, thank you  
21 for, for hosting this call. And thank you for  
22 allowing me the opportunity to comment. My name is  
23 Ryan Pleskach, I'm currently a Town Councilor in the  
24 Town of Clay. While you know, the town does not have  
25 a lot of --.

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2 MR. DAVIS: Ryan, could you please  
3 spell your last name?

4 MR. PLESKACH: Sure. P-L-E-S-K-A-C-H.

5 MR. DAVIS: Thank you.

6 MR. PLESKACH: Sure. So as I was  
7 saying, I'm currently a Town Councilor for the Town  
8 of Clay. And I just want state that you know,  
9 overall, generally, in favor of the project.  
10 There's, there's a lot of details to -- to be  
11 released and for -- for us to get into the weeds and  
12 understand more of what the actual impacts are long  
13 term. However, overall, I am generally in favor of  
14 the project, but I would also like to caution the  
15 county as one commenter did a couple ago. I'm not in  
16 favor of using eminent domain for the purpose of a,  
17 you know, a private company building this chip  
18 manufacturing facility. It's not necessarily the  
19 same thing as eminent domain being used to, to build  
20 a tunnel or an on-ramp or some kind of general public  
21 use project. Long term I understand that there are,  
22 you know, several downstream public, you know,  
23 impacts however, I'm generally against the use of  
24 eminent domain, as I understand the facts to be in  
25 this current -- current situation. Thanks for your

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2 time.

3 MR. DAVIS: Thank you for your  
4 comment. Next up is Barb O'Brien, and on-deck is  
5 Michelle Nuzzo.

6 MS. O'BRIEN: Barbara O'Brien, B-A-R-  
7 B-A-R-A O'Brien, O-B-R-I-E-N. Did you get my name?

8 MR. DAVIS: Yes, I did.

9 MS. O'BRIEN: Okay. The financial  
10 problems that we're all going to face are bad enough.  
11 I'm a -- I'm a landowner, homeowner here in Clay on  
12 Burnett Road, plus the emotional ones the homeowners  
13 will face must be considered, they really must. By  
14 you, even though many, many of us don't want to move  
15 period. The contamination the so-called Park may  
16 cause in -- is to the air, the air we breathe the  
17 water, the land, from the cars, the additional trucks  
18 and the general excrement from the Park will be  
19 great. And our country, the USA is trying very hard  
20 to go green, this park will have the opposite effect.  
21 And don't you care as you make money and then try to  
22 impress your fellow politicians at this expense of  
23 the present and the future generation.

24 This whole project needs some caring  
25 and consideration and people to help this area that

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2 know what they're doing. We should be staying green  
3 and not trying to go brown or gray like the concrete  
4 that's going to be poured all over this beautiful  
5 land. I just don't think it's fair. And I don't  
6 understand why you can't go west, away from the  
7 populated areas of Cicero. And the high traffic  
8 areas that are already down there. Go away from it,  
9 head West. You have to cross Caughdenoy Road. Well,  
10 here you're taking Burnett. So you can certainly  
11 build a bridge. And I know as far as Niagara Mohawk  
12 goes to their wires they just installed. I don't  
13 know how many tons of wire, it's going to split this  
14 whole Park right in half. I don't understand why  
15 they put that right straight down the middle of this  
16 old development that they're talking about. But  
17 thank you very much for your time. And I hope it  
18 doesn't go through. And I'm sorry, I don't  
19 understand why you can't put it someplace else  
20 instead of in this area that is populated. I just  
21 don't understand that. Thank you.

22 MR. DAVIS: Thank you for your  
23 comment. Next up is Michelle Nuzzo, on-deck Annette  
24 Capria.

25 MS. NUZZO: Can you hear me?

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2 MR. DAVIS: Yes, I can.

3 MS. NUZZO: Okay. My name is Michelle  
4 Nuzzo. I live on Burnett Road you know, the road  
5 that's wanted for what's been a pipe dream project  
6 for over twenty years now. The first thing I'd like  
7 to know is, have any of you on the board, and I know  
8 you can't answer this, but think about this please.  
9 Have any of you that's on the board, or those that  
10 support this project, have any of you been  
11 threatened with eminent domain? Have any of you had  
12 to live with the uncertainty of losing your home? I  
13 like you, I'd like to ask you, how would you feel if  
14 you were in our shoes? See this doesn't affect any  
15 of you, because most of you, I'm sure don't even live  
16 in this area. But if this were in your area, how  
17 would you feel?

18 I'm asking for you to take a good hard  
19 look at White Pine, and explore your four alternative  
20 options, because the community does not want this  
21 here. We have over thirteen hundred signatures on  
22 our petition, and the number is still growing. We  
23 have over five hundred people on our community group  
24 that are opposed to this project, and that number is  
25 still growing. Maybe this would have been a great

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2 idea many years ago before neighborhoods and  
3 developments were built surrounding White Pine.

4 Have any of you actually driven out  
5 here and seen how close the homes are? Have you seen  
6 all the signs in people's yards opposing this? Has it  
7 struck you that it's not just about having enough  
8 land? Maybe New York just does not have the best  
9 climate hence why Samsung went to Texas and not New  
10 York just recently.

11 I'd also like to point out our road is  
12 being falsely advertised as if OCIDA already owns it  
13 to attract a buyer. This is absolutely mind  
14 boggling. The county is spending unknown money here  
15 and you aren't any better prepared today than you  
16 were twenty years ago, despite your name change for  
17 White Pine. This area cannot handle traffic for a  
18 project that's three times the size of New York State  
19 Fair. The wetlands have to be reassessed. You're  
20 talking about projects or you I'm sorry, you're  
21 talking about properties without taking properties  
22 without a clear project in mind. At this time, I'm  
23 requesting to see an updated site plan concept  
24 drawings. Why is taking Burnett Road in the plans. I  
25 would like this laid out and I would like this sent



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2 to our attorney Neil Gingold.

3 Corporations are being prioritized  
4 over human beings. You can create jobs without  
5 displacing people from their homes and destroying a  
6 community in the process. We oppose development that  
7 would force dozens of families out of their homes and  
8 affect hundreds of acres of farmland, woods and  
9 natural wetlands. We support development that allows  
10 our community to remain intact. That's all I have.  
11 Thank you for your time.

12 MR. DAVIS: Thank you for your  
13 comment. Next up is in Annette Capria. On-deck is  
14 Gary Mace.

15 MS. CAPRIA: Annette Capria, A-N-N-E-  
16 T-T-E C-A-P-R-I-A. I'm very opposed to this.  
17 What's currently been built there can't support the  
18 traffic that we already have. That ten years ago or  
19 twenty years ago when they started to decide to build  
20 this, we didn't have all of this other development.  
21 I'm not sure how many of you try to drive through  
22 this road at this point. It's getting quite  
23 difficult. And when I moved to this area while I was  
24 born in this area, and I stayed in this area, because  
25 it was the Town of Clay. Not the city of Clay. I

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2 don't think that the environmental impact is being  
3 considered. And with over, with all the other  
4 signatures, it seems to me that people are pretty  
5 happy with the way of living as it sets. I don't  
6 agree with this at all. And displacing people out  
7 of their homes, their lifelong homes. And with all  
8 these people being so happy with their lives as it  
9 is, I don't understand why they can't find another  
10 site that would be much more suitable.

11 It just doesn't make any sense to me.  
12 You can just drive around Onondaga County and there's  
13 so many abandoned properties. It's ridiculous. It's  
14 unbelievable. And now you want to put something in  
15 the middle of this residential area that doesn't  
16 belong there and we cannot support it. We can't  
17 support it traffic-wise. And I mean, how about the  
18 police department? Do we have enough on, on the force to  
19 handle it. Those are questions that I just don't see  
20 getting answered. Thank you.

21 MR. DAVIS: Thank you for your  
22 comments. Next up is Gary Mace. And we currently  
23 have no other speakers who've identified they'd like  
24 to speak.

25 MR. MACE: Hi, can you hear me?

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2 MR. DAVIS: Yes, I can.

3 MR. MACE: Hi, my name is Gary Mace,  
4 M-A-C-E. I am a resident that's down the street from  
5 this location. My backyard backs up to Caughdenoy  
6 Road. I've been hearing a lot of business owners out  
7 there that are loving the idea. And I agree, I mean,  
8 this is a great opportunity for New York State,  
9 Syracuse. The problem is, is that all these business  
10 owners, yes, they're business owners, they're not the  
11 common, everyday resident in the area where this  
12 would impact. I've got a lot of concerns. We've had  
13 mentioned of our traffic and the infrastructure  
14 around here to be able to support this type of a -- a  
15 venture. We've got problems now that haven't been  
16 addressed. Who is going to take care of that? Who's  
17 going to foot the bill? Great, you're going to have  
18 more residents in here. Our taxes. Who's going to  
19 pay for the road improvements? Who's going to take  
20 care of the traffic? Are they going to widen  
21 Caughdenoy Road out here to four lanes so people can  
22 get off 481 to go down the street to this mammoth  
23 factory? Route 31 is not capable of handling this  
24 type of traffic.

25 We have a spur over there with 81 and

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2 31 and Route 11. We've been dealing with a problem  
3 with this for years, the state hasn't come in, the  
4 town hasn't come in, nobody's come in to resolve this  
5 issue. I work for the local school district, school  
6 bus driver. Anybody traveled through those areas at  
7 peak time trying to get kids through there safely?  
8 These things, I don't see how they're going to be  
9 resolved without the common person in these  
10 neighborhoods, in the local area is going to be  
11 footing the bill because you know, the state isn't  
12 going to step up and take it. And even if the state  
13 does, we're going to pay for it anyways.

14 On top of that, these tax benefits  
15 that these companies get when they come into the  
16 areas who pays for that? We do. So yes, you're  
17 going bring in high tech people possibly, that  
18 doesn't support the local people that live here now.  
19 Because the local people here now you ... Not  
20 everybody can go and swing a hammer or cement. These  
21 are very --

22 MR. DAVIS: Twenty seconds.

23 MR. MACE: -- these are very  
24 specialized jobs that aren't going to sustain the  
25 area. There's a lot of issues that need to be

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2 addressed. I support bringing the stuff in, not in  
3 this area. We just don't have the infrastructure for  
4 it. Thank you.

5 MR. DAVIS: Thank you for your  
6 comment. We have two more speakers who identified  
7 they'd like to speak. We have Kevin Meaker up now,  
8 and on-deck would be Renee Cordell.

9 MR. MEAKER: Kevin J. Meaker, Town of  
10 Clay. Also Town councilor in the Town of Clay. Can  
11 you hear me, sir?

12 MR. DAVIS: Yes, I can.

13 MR. MEAKER: Thank you. I'd like to  
14 say first, that I'm opposed to using eminent domain  
15 in regards to this projects, number one. And number  
16 two, I would like to say that there is a much needed  
17 -- need for improvements to the infrastructure of  
18 Route 481 and 81 in regards to this project. Thank  
19 you for your time.

20 MR. DAVIS: Thank you for your  
21 comment. Next up is Renee Cordell.

22 MS. CORDELL: Hello, can you hear me?

23 MR. DAVIS: Yes, I can.

24 MS. CORDELL: Okay. It's Renee  
25 Cordell, R-E-N-E-E C-O-R-D-E-L-L. I'm strongly

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2 opposed to this mega development. I looked through  
3 the GEIS this afternoon. I read through it pretty  
4 carefully. There's four alternatives that are  
5 listed. And a bunch of them happen to say like no  
6 project or a smaller project. And basically they say  
7 they can't, they don't want to do that because they  
8 basically just don't want to. They want to attract  
9 that big fish. And unfortunately, to do that, they  
10 need to take people's properties and it spells right  
11 in there that that's what they want to do. Eminent  
12 domain. It's unnecessary. There's other things they  
13 can do, they just don't want to.

14 Also a big issue to me, as I have  
15 lived in Clay my entire life and I have my children  
16 here. They go to school locally, and I am extremely  
17 concerned about the hazardous materials that are used  
18 to make these chips in a semiconductor factory. I  
19 don't want, I live pretty close to where it will be.  
20 And I don't want the pollution going into the air  
21 that I, me and my children breathe. There are parks  
22 located around there nursing homes, churches, all  
23 these people will be affected by air pollution, water  
24 pollution, but nobody's mentioning that. We're only  
25 talking about jobs, and probably an abandoned

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2 building down the road. That's all.

3 MR. DAVIS: Thank you for your  
4 comment. We have nobody currently in the queue. If  
5 you have not spoken and you would like to speak,  
6 please put your name in the chat function. If you're  
7 on the phone, please raise your hand. Next up is  
8 Kevin Schwab.

9 MR. SCHWAB: Hi, thank you for the  
10 opportunity to say a few words. My name is Kevin  
11 Schwab, K-E-V-I-N S-C-H-W-A-B. I'm with Center  
12 State CEO. And I did want to just say a couple of  
13 words about the site itself. We have a unique  
14 opportunity here that a number of people have spoken  
15 to already. And frankly, there are lots of reasons  
16 to be excited about that opportunity and the impact  
17 it has on this region, and what it could really mean  
18 for our economy going forward. But the site itself  
19 is the reason for that. This is a nationally  
20 recognized site that really has few peers in terms of  
21 its suitability for the types of high tech  
22 development that are being discussed here today. The  
23 site is essentially shovel ready, it has tremendous  
24 electric capacity, great access to water, close  
25 highway access, excellent broadband, and in protected

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2 communications capabilities.

3 It has really got the ability to host  
4 a major high tech facility with relatively minimal  
5 impacts. And the types of things that are discussed  
6 relative to road improvements near the site, or the  
7 addition of sewer lines are things that can readily  
8 be done in a project like this, particularly given  
9 the impact that it can have on our community. It is  
10 exactly the type of project that's contemplated when  
11 you have an asset like this, it can have really  
12 tremendous benefits for our community, while having  
13 very minimal requirements in terms of what would have  
14 to be done to make it fully ready.

15 MR. DAVIS: Thank you for your  
16 comment. At this time, we have no new speakers that  
17 have identified that they would like to speak. And  
18 we'll keep it open just for a few more minutes. And  
19 remind everyone that written comments will be  
20 accepted by the agency until June 11, 2021. May be  
21 submitted to Robert Petrovitch, Executive Director of  
22 OCIDA at 333 West Washington Street, Suite 130,  
23 Syracuse, New York, code 13202. Or you can email  
24 comments economic development at ongov.net. Written  
25 comments carry the same weight as comments expressed



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2 this evening. In all comments, whether expressed  
3 this evening or in writing are addressed in the  
4 final, a generic environmental impact statement.  
5 Somebody else just came on just give us a moment.  
6 Cody Kelly up to speak.

7 MR. KELLY: Hi, can you hear me?

8 MR. DAVIS: Yes, I can

9 MR. KELLY: Okay. My name is Cody  
10 Kelly, C-O-D-Y K-E-L-L-Y. I am the Onondaga County  
11 legislator representing the 14th district. I also  
12 happen to be a resident of Burnett Road. I would  
13 like to first echo the concerns of my neighbors and  
14 some of the other members of the community with  
15 regards to the use of eminent domain on Burnett Road  
16 homeowners and assembling the White Pines property.  
17 One other area that I'd like to address that I  
18 haven't heard substantially covered yet, is  
19 enrollment in the Cicero North Syracuse School  
20 District. I was able to read through the report, and  
21 this was mentioned, albeit very briefly. And I  
22 believe that more data should be presented to fully  
23 communicate the point of projected enrollment in a  
24 future where the White Pine project becomes reality.

25 I am a 2009, graduate of CNS High

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2           School, which is just a few miles down the road.   And  
3           I know when I was there, that building was  
4           essentially bursting at the seams.   So I have  
5           concerns about what that building would be able to  
6           handle with any increase in enrollment going forward.  
7           Like we've all mentioned, this project could be a  
8           serious economic boom in the community.   And I  
9           believe an estimate of a one point six percent  
10          increase could be very conservative, which is why I'd  
11          be interested to see further data on that point.   My  
12          concern there is that I would not want to see a  
13          future where the local taxpayer and the Town of Clay  
14          Town of Cicero and Town of North Syracuse are  
15          responsible to make up any necessary tax increases to  
16          accommodate what an enlarged enrollment base could  
17          look like.   So thank you for having this hearing.  
18          And that's all.

19                           MR. DAVIS:   Thank you for your  
20          comment.   Anybody else, new speakers that would like  
21          to speak?   No one in the chat room.   No one raising  
22          their hand currently.   Give it one more minute and  
23          ... comes on we'll close to hearing.   And again,  
24          accept written comment until June 11.   All right.  
25          I'd like to thank everybody for participating this

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2           evening and providing your public comment.  Again  
3           written comment will be accepted until June 11, 2021.  
4           And all the information available for written comment  
5           is on the OCIDA website.  You can also email to  
6           economic development at ongovnet.           Thank you,  
7           everyone.  We appreciate your comments.  Good evening.

8                               (The hearing concluded at 7:24 p.m.)  
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2 STATE OF NEW YORK

3 I, ANNETTE LAINSON, do hereby certify that the foregoing  
4 was reported by me, in the cause, at the time and place,  
5 as stated in the caption hereto, at Page 1 hereof; that  
6 the foregoing typewritten transcription consisting of  
7 pages 1 through 59, is a true record of all proceedings  
8 had at the hearing.

9 IN WITNESS WHEREOF, I have hereunto  
10 subscribed my name, this the 28th day of May, 2021.

11

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13 ANNETTE LAINSON, Reporter

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5-24-2021 1:1 2:1 3:1 4:1 5:1 6:1 7:1 8:1 9:1 10:1 11:1 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1 53:1	

54:1 55:1 56:1 57:1 58:1 59:1



## **APPENDIX C**

### **Correspondence and Comments Received**





## Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO  
Governor

ERIK KULLESEID  
Commissioner

May 27, 2021

Abby Heller  
Archaeologist  
JMT  
1600 Market Street  
Ste 520  
Philadelphia, PA 19103

Re: DEC  
White Pine Commerce Park  
NYS Route 31, Town of Clay, Onondaga County, NY  
21PR03336

Dear Abby Heller:

Thank you for requesting the comments of the Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted materials in accordance with the New York State Historic Preservation Act of 1980 (Section 14.09 of the New York Parks, Recreation and Historic Preservation Law). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8) and its implementing regulations (5NYCRR Part 617).

We have reviewed the Draft Supplemental Generic Environmental Impact Statement. OPRHP understands that the Onondaga County Industrial Development Agency does not currently own the entirety of the proposed 1,250-acre White Pine Commerce Park, and that acquisition of the land and development of the Park will take place gradually over time. Based on these circumstances, OPRHP's preferred approach is to review and provide comments tailored to specific development plans, when the conceptual site plans are available.

If further correspondence is required regarding this project, please refer to the OPRHP Project Review (PR) number noted above. If you have any questions, please contact me via email.

Sincerely,

Tim Lloyd, Ph.D.  
Scientist - Archaeology  
timothy.lloyd@parks.ny.gov

via e-mail only



## Department of Transportation

**ANDREW M. CUOMO**  
Governor

**MARIE THERESE DOMINGUEZ**  
Commissioner

**DAVID P. SMITH, P.E.**  
Regional Director

June 11, 2021

Mr. Robert Petrovich, Executive Director  
Onondaga County Industrial Development Agency  
333 West Washington St., Suite 130  
Syracuse, NY 13202  
[economicdevelopment@ongov.net](mailto:economicdevelopment@ongov.net)

Dear Mr. Petrovich:

RE: SEQR LEAD AGENCY DESIGNATION  
WHITE PINE COMMERCE PARK EXPANSION  
PROJECT, 5171 NYS ROUTE 31  
TOWN OF CLAY, ONONDAGA COUNTY

The New York State Department of Transportation (NYSDOT) has received the Generic Environmental Impact Statement (GEIS) regarding the proposed White Pine Commerce Park Expansion Project (formerly known as the Clay Business Park) in the Town of Clay.

NYSDOT staff is still reviewing the Traffic Impact Study (TIS) provided to ensure the study meets our requirements and provides all the information we need to determine traffic impacts to the State Highway System. Mitigation will be required to address traffic impacts. All required mitigation must be reflected in site plans prior to NYSDOT's approval. We will provide further comments as we complete the review. Considering the size of the proposed development, NYSDOT expects substantial mitigation will be required on the State Highway System.

The following comments are being carried forward from our previous letter. These comments will need to be addressed as the site plan is developed:

1. A highway work permit will be required for any work within the State Right-of-Way (ROW) along NYS Route 31. The plans that are prepared toward permit issuance must show our ROW boundary. The final project plans must reflect mitigation as may be determined by the Department. The applicant should coordinate with NYSDOT during plan preparation to ensure that the design meets Department standards and requirements. A consultant inspector may be required for this work.
2. Utility installation within the State ROW will require a utility permit. If feasible, all steps to avoid open cutting a state highway for the water/sewer installation shall be progressed. The plans that are prepared toward permit issuance must show our ROW boundary.

Mr. Robert Petrovich  
June 11, 2021  
Page 2

3. The applicant must provide NYSDOT a copy of the Storm Water Pollution Prevention Plan (SWPPP) for review. No additional stormwater flow into the State's ROW shall be permitted.
4. The applicant must submit a photometric lighting plan to the NYSDOT. No glare or spillover onto the State ROW will be permitted.

If you or the applicant have any questions pertaining to the permit process, please contact Jeff Deep, Assistant Regional Permit Engineer, at [Jeffrey.Deep@dot.ny.gov](mailto:Jeffrey.Deep@dot.ny.gov) or (315) 428-3233.

Very truly yours,

MARK FRECHETTE, P.E.  
Director, Planning and Program Management Group

By



Julie Baldwin  
Senior Transportation Analyst

JAB:MF:cm



**Department of  
Transportation**

**ANDREW M. CUOMO**  
Governor

**MARIE THERESE DOMINGUEZ**  
Commissioner

**DAVID P. SMITH, P.E.**  
Regional Director

July 8, 2021

Ms. Christina M. Minkler, Vice President  
JMT of New York, Inc.  
307 South Townsend Street  
Syracuse, NY 13202

Dear Ms. Minkler:

RE: WHITE PINE COMMERCE PARK TIS  
5171 NYS ROUTE 31, TOWN OF CLAY  
ONONDAGA COUNTY

The New York State Department of Transportation (NYSDOT) has received the traffic impact study (TIS) by JMT as part of the environmental review of Onondaga County Industrial Development Agency's proposed expansion of the existing White Pine Commerce Park (Project) in the Town of Clay.

NYSDOT staff is still finalizing the review comments, but we don't anticipate any major significant issues that will prohibit the development from progressing forward as a project. Having said that, we have determined that additional improvements will be required to offset impacts from the proposed White Pine Commerce Park.

There are several feasible improvement options being analyzed within NYSDOT that can address these operational and safety impacts. Once we complete our review, you will be notified of all our comments and recommendations.

We look forward to working with you on this project. If you have any questions, please contact Scott Bates at (315) 428-4385.

Very truly yours,

A blue ink signature of David P. Smith, P.E., written in a cursive style.

David P. Smith, P.E.  
Regional Director

cc: Scott Bates, Assistant Regional Traffic Engineer  
Brian J. Donnelly, Deputy County Executive, Onondaga County

**From:** "Smith, David (DOT)" <[David.Smith@dot.ny.gov](mailto:David.Smith@dot.ny.gov)>  
**Date:** July 9, 2021 at 12:05:58 PM EDT  
**To:** Brian Donnelly <[BrianDonnelly@ongov.net](mailto:BrianDonnelly@ongov.net)>  
**Subject:** White Pine Commerce Park TIS

**NOTICE:** This email originated from outside of Onondaga County's email system. **Use caution** with links and attachments.

Brian,

As a follow up to my July 8<sup>th</sup> letter regarding the proposed subject development, I wanted to further clarify NYSDOT's analysis of the TIS.

We've concluded that, as written, the TIS appropriately documents the study area. Within the study area, the TIS offers proposed mitigation for the impacts of the trips generated by the potential development. NYSDOT will follow up with location-specific comments relating to the details of mitigation within the study area. On that point, it is anticipated that additional coordination and communication will take place as this project develops further, to arrive at the specific details of the mitigation. That said, NYSDOT agrees that the TIS is appropriate based upon the information presented.

Please feel free to call me if you have questions.

Dave

**David P Smith, P.E.**

Regional Director

**New York State Department of Transportation, Central New York Region**

333 East Washington St

(315) 428-4351 | [david.smith@dot.ny.gov](mailto:david.smith@dot.ny.gov)

[www.dot.ny.gov](http://www.dot.ny.gov)



**Department of  
Transportation**

**From:** Parmley, Elizabeth (DOT) <[Elizabeth.Parmley@dot.ny.gov](mailto:Elizabeth.Parmley@dot.ny.gov)>  
**Sent:** Monday, July 12, 2021 3:48 PM  
**To:** Minkler, Christina <[CMinkler@jmt.com](mailto:CMinkler@jmt.com)>  
**Cc:** Bates, Scott (DOT) <[Scott.Bates@dot.ny.gov](mailto:Scott.Bates@dot.ny.gov)>; Smith, David (DOT) <[David.Smith@dot.ny.gov](mailto:David.Smith@dot.ny.gov)>  
**Subject:** [EXTERNAL] White Pines TIS Review comments

Christina,

Attached are our review questions & comments on the White Pines TIS>

Scott Bates completed the review and if there are any technical comments, he can assist. We would also be happy to participate in a Teams meeting to go over our recommendations once you have a chance to review it.

It should be noted that we are suggesting some alternative mitigation ideas, known as "Option 2" in the document. This would be our recommended option for the specific areas it covers near the I81/31 interchange.

Any questions, let us know.

Betsy

**Elizabeth Parmley, P.E.**

Regional Traffic Engineer

**New York State Department of Transportation, Central New York Region**

333 E. Washington Street, Syracuse, NY 13202

(315)428-4381 | [elizabeth.parmley@dot.ny.gov](mailto:elizabeth.parmley@dot.ny.gov)

[www.dot.ny.gov](http://www.dot.ny.gov)

# White Pine Commerce Park TIS Review (May 2021 Submission)

NYSDOT Review Date: 7/12/2021

## TIS Comments

1. No site plan was provided as part of the TIS to support the access points, traffic control, and mitigation near the proposed site.
2. If no site plan is available, how did the proposed locations of the proposed driveways be derived? Per the Synchro models, the access on Route 31 (Entrance 2) is between Stearns Road and Burnet Road. Are there any impacts to these two intersections from the new development? These two unsignalized intersections were not analyzed as part of the TIS.
3. What entrance to the site will be the main truck entrance/exit? Typically for a development of this type, one entrance is dedicated as the main truck access.
4. Synchro inputs show 10% heavy vehicles will use both entrances. However, there are no truck percentages shown for the adjacent intersections such as the Route 31 @ Caughdenoy Rd. intersection. This should have been inputted and distributed in Synchro for at least this intersection based on the truck percentage used for the site.
5. Depending on truck access and the proposed site plan, additional improvements (turn lanes) at the Route 31 at Caughdenoy Road intersection may be required if a large percentage of trucks will be turning at this intersection to get to the site entrance on Caughdenoy Road.
6. In the new trips schematic diagram, why are there so many new trips coming from Pardee Road to Route 31? I believe this is an error in the diagram only.
7. What is proposed for restrictions for all the commercial driveways on Route 31 between Route 11 and I-81 SB Ramp? The addition of a 2<sup>nd</sup> WB left turn lane on Route 11 will make it near impossible for vehicles to make a left to/from the driveways on both sides of Route 31.
8. In the synchro models, there are stop-controlled driveways just to the west and east of the I-81 ramps. Assumed it's in the models for balancing volumes? There is no explanation in the TIS regarding them.
9. In 2024 & 2044 Synchro models, the simulation shows motorists are unable to exit the driveway for the gas station (opposite Empower Credit Union) because the volume on Route 31 is so heavy. Assumed this driveway is for balancing volumes too or is this to mimic the commercial driveways in this section?
10. Proposed AM models shows excessive queuing on Route 31 WB at Route 11 as result of the phase change and added volumes. See additional details on this comment on page 2 under Technical Comments.
11. Storage length of 125' for NB Right turn should be increase to at least 350'+ based on the 95<sup>th</sup> percentile queue length. See additional details on this comment on page 3 under Technical Comments.
12. For Route 31 @ Lakeshore Road, only 2024 AM and PM were analyzed. 2044 was not like all the other studied intersections within the TIS.
13. Many LOS and queue lengths in the Synchro files do not match LOS & queue tables for various intersections and alternatives. This mainly occurred for the some of the intersections in Cicero.
14. The trip distribution only shows 10% of the trips to utilize the Route 481 at Caughdenoy and Maple intersection. This location has an existing crash pattern and has a high potential to be used more than what's estimated in the TIS because how close it is to the site. Higher volumes here will most likely correlate to an increase in crashes if not addressed as part of the improvements. See additional details on this comment on page 4 under Technical Comments.

### MITIGATION CONCEPT OPTIONS

OPTION 1 – DUAL LEFT TURN LANES (PER THE TIS) + NYSDOT ADDITIONAL IMPROVEMENTS  
OPTION 2 – NYSDOT SINGLE LEFT TURN LANES CONCEPT + ADDITIONAL IMPROVEMENTS

### Color Key

Black Font = Proposed Mitigation by JMT  
Blue Font = Additional NYSDOT mitigation



## **Technical Comments & Recommended Additional Mitigation (based on TIS LOS & Queue Tables)**

### NYS Route 31 at Caughdenoy Road

- Based on information in the TIS, LOS is an A for this intersection. However, depending on the site plan and where the main truck access is for the development, there may be a need to do improvements at this intersection.

NYSDOT Recommendation: Further evaluate based on the proposed site plan and truck egress/ingress if turn lanes are required at this intersection. If any widening is needed, it will most likely involve a new signal.

### NYS Route 31 at US Route 11

- In 2024 Background Development AM/PM peak hour, queue length for Route 31 EB Thru/Right goes from 260' / 315' to 410' / 715'. EB queues today already back up into the single lane section on Route 31 during the peak hours. The new trips added to this Route 31 EB approach are 238 / 267 vph. The queue length increase is a result of the new trips and signal phase change for the Route 31 WB left turn going from protective/permissive to protected-only phase. Simulations also confirmed the queue.

#### NYSDOT Recommendation (Option 1):

- Signal modifications should include upgrading to video detection to maximize the timing efficiency.
- The SE corner of the intersection may need to be widened to receive a westbound dual left turn lane.
- Lengthen the storage for the two (2) Route 31 EB thru lanes at Route 11 to handle the additional queue length from the additional new trips destined to the I-81 SB on-ramp.

#### NYSDOT Recommendation (Option 2):

- Construct an additional NB Route 11 right turn lane (125' Min).
- Convert one of the NB receiving lanes on northern leg to a short SB Route 11 left turn lane.
- Signal modifications include split phasing both Route 11 approaches & upgrading to video detection.
- Lengthen the storage for the two (2) Route 31 EB thru lanes at Route 11 to handle the additional queue length from the additional new trips destined to the I-81 SB on-ramp.

### Route 31 (Between Route 11 and I-81 SB Ramps)

- Not only are their queue concerns on Route 31 between Route 11 and the I-81 SB Ramp intersections, vehicles should not be permitted to turn left at any of the commercial driveways within this section on Route 31. The existing crash pattern on the collision diagram supports this restriction. The additional volume due to the new development, along with the longer queues, will only worsen the existing crash patterns along this segment. Allowing left turning vehicles will also negatively impact operations and increase delays more than what Synchro and the simulations indicates in the TIS.

#### NYSDOT Recommendation (Options 1 & 2):

- Modify commercial driveways in this section (both north and south side) to operate as a right-in/right-out, which may also involve improvements to their connection to Crabtree lane.
- To address the existing crash patterns and enhance operations in this section, install a narrow-curbed median from the Route 11 at Route 31 intersection to the Route 31 @ I-81 SB Ramp intersection.

### NYS Route 31 at I-81 SB Ramps

- In 2024 Background Development AM/PM peak hour, queue length for Route 31 EB Thru/Right goes from 160' / 170' to 680' / 340'. The new trips added to this Route 31 EB approach are 242 / 216 vph with approximately 70% of those trips making a right turn to get onto the I-81 SB Ramp. There is only 624' of storage for Route 31 EB from this intersection to the Route 11 at Route 31 intersection. The queue length increase is a result of the new trips and signal phase change for the Route 31 WB left turn going from protective/permissive to protected-only phase. Simulations also confirmed the queue.

#### NYSDOT Recommendation (Option 1):

- Construct a signalized right turn slip ramp on Route 31 for the I-81 SB on-ramp (100-150' storage). This will involve closing Crabtree Lane at Route 31. The right turn will be a protected only.
- Modify signal, sign, and pavement markings on the I-81 SB off-ramp to have no through movement. The approach will only have a designated left and right turn only lane.
- Replace existing signal with new three-color signal.

#### NYSDOT Recommendation (Option 2):

- Construct an additional lane underneath bridge so both Route 31 left turn lanes (WB left turn for I-81 SB on-ramp and EB left turn for Pardee Rd.) are side by side to maximize storage capacity.
- Widen the EB approach to have a dedicated 650' right turn slip ramp that free flows onto the on-ramp. Widen to two lanes on the on-ramp before merging to a single lane prior to the merge on I-81.
- Modify signal, sign, and pavement markings on the I-81 SB off-ramp to have no through movement. The approach will only have a designated left and right turn only lane.
- Replace existing signal with new three-color signal. One controller for both signals near bridge.

#### NYS Route 31 at I-81 NB Ramp and Pardee Road

- In 2024 Background Development AM/PM peak hour, queue length for the I-81 NB off-ramp right turn goes from 135' / 165' to 240' / 500' with the proposed dual right turn lane. The new trips added to I-81 NB off-ramp are 110 / 124 vph with 100% of those trips making a left turn towards the new development. The storage capacity for both the left and right turn lanes need to be sufficient so both dual turn lanes can be utilized and not blocked by the adjacent lane. Also, not evident in the LOS tables are the existing EB queue issues underneath the bridge caused by the short available storage area for the left turns onto Pardee Road.

#### NYSDOT Recommendation (Options 1 & 2):

- The storage length of the new NB right turn lane needs to increase from 125' to 350'+/- to accommodate the 95<sup>th</sup> percentile queue length.
- Replace existing signal with new three-color signal. One controller for both signals near bridge.
- Install advance overhead guide signs on I-81 NB off-ramp approach to signal.
- Modify Route 31 WB left turn phasing from protective/permissive to protective-only phasing to address the left turn crash pattern.

#### Route 31 (Between I-81NB Ramps/Pardee Rd. and Lakeshore Road)

- Like the west side of the bridge, there are queue concerns on Route 31 WB between I-81/Pardee Road to Lakeshore Road. There are still only two WB through lanes on Route 31, so there are marginal improvements to the westbound queue length. To improve operations and safety, vehicles should not be permitted to turn left at any of the commercial driveways within this section on Route 31. The existing crash pattern on the collision diagram supports this restriction. The need to modify the Route 31 EB left turn phasing from protective/permissive to protective-only phasing (need more time) to address left turn crash patterns will only worsen these conditions.

#### NYSDOT Recommendation (Options 1 & 2):

- To address the existing crash patterns and enhance operations in this section, install a narrow-curbed median from the Route 11 at Route 31 intersection to the Route 31 @ I-81 SB Ramp intersection.
- Convert center TWLT lane to an WB thru lane so vehicles destined for the I-81 SB Ramp are aligned with the left turn lane underneath the bridge. This would then transition to the EB left turn lane needed for Lakeshore Road.

#### NYS Route 481 at Caughdenoy Road and Maple Road

- Based on information in the TIS, LOS is an A for this intersection. TIS suggests a roundabout to reduce the right-angle crashes as an option but does not include it as part of the mitigation for the development. Currently,

the NYS Route 481 NB approach has 74/417 vph during the AM/PM peak hours. Assuming only 10% of the total trips use this intersection, the development will add 49/44 vph during the peak periods. As the volumes increase at this intersection, so does the safety concerns. If this intersection has the potential to be used more than what's estimated in the TIS, consideration should be given to have those improvements incorporated as part of the mitigation.

**NYSDOT Recommendation:** Intersection improvements to address additional traffic and safety concerns.

NYS Route 31 at Lakeshore Road – Five (5) conceptual alternatives were provided to address the operational and safety issues.

**Alternative A – Provide a signalized double right from Lakeshore Road westbound at NYS Route 31 by converting the eastbound lane. The existing left turn movement will be relocated to the signalized Lakeshore Road Spur intersection approximately 300 feet to the east. NYS Route 31 westbound traffic will be stopped at the existing Lakeshore Road intersection but NYS Route 31 eastbound traffic will free flow. The signal could be timed such that the NYS Route 31 eastbound left at the Lakeshore Road Spur could operate at the same time as the Lakeshore Road westbound double right. No right-of-way should be required.**

Alternative A: Intersection LOS B (12.0) in AM and LOS C (25.7) in PM for Route 31 @ Lakeshore Road. Route 31 WBT LOS is E with queue length of #720' in PM peak. Intersection LOS A (9.7) in AM and LOS D (48.4) in PM for Route 31 @ Lakeshore Road Spur intersection. Route 31 WB thru is LOS F with a queue length #677. ICO LOS is F with 0.92 in PM. Route 31 EB left is LOS E with a queue length of #487. Not in favor for a high volume left turn movements turn onto Lakeshore Road Spur and then into a stop-controlled sign on a grade. If this was free flow it would be better, but there are residential properties on Lakeshore Road that still need to turn left at this intersection. No ROW required.

NYSDOT Alternative A2: Alternative A but widen Lakeshore Road Spur to have a NB free flow right turn slip ramp at Lakeshore Road. Need to have a NB 50' left turn lane with stop sign on this approach. Also, 175' east of the Lakeshore Road Spur intersection, widen to open up two (2) WB thru lanes and connect to the Route 31 at Lakeshore Road intersection to the west. Impacts ROW.

Intersection LOS A (7.9) in AM and LOS A (5.6) in PM for Route 31 @ Lakeshore Road. All turning movements are a LOS B or better, with no queue length longer than 189'. Intersection LOS B (11.2) in AM and LOS B (15.1) in PM for Route 31 @ Lakeshore Road Spur intersection. Route 31 WB thru is LOS B with a queue length #209'. ICO LOS is C with 0.72 in PM. Route 31 EB left is LOS C with a queue length of #265'.

**Alternative B – Realign Lakeshore Road at NYS Route 31 so that the westbound right turn free flows on to NYS Route 31 westbound. The left turn from NYS Route 31 eastbound to Lakeshore Road eastbound will take place at a more 90-degree movement instead of the existing skew. There could be some right-of way take in the northeast quadrant.**

Alternative B: Not much different than what is there today except Lakeshore is a free move now. I think this modification will create safety issues downstream for vehicles to maneuver into the correct lanes. Concerns on the conversion to free flow which will equate to higher speeds on a downward grade on Lakeshore Road. No work done at the Route 31 and Lakeshore Road Spur intersection. Does not address Route 31 EB left turn queue issues.

**Alternative C – A signalized double right would be provided on Lakeshore Road westbound like Alternative A. This alternative would have the left turn from NYS Route 31 eastbound to Lakeshore Road eastbound occur in the same manner as the existing condition. Widening would take place along the east side of Lakeshore Road. Widening is shown along the north side of NYS Route 31 between the Lakeshore Road and the Lakeshore Road Spur to provide additional capacity at the Lakeshore Road intersection. Right-of-way appears to be needed. The NYS Route 31 eastbound traffic would still free flow through the Lakeshore Road intersection.**

Alternative C: Intersection LOS B (12.1) in AM and LOS A (8.3) in PM. Route 31 WBT LOS is B with queue length of #376' and 440' at Lakeshore Road and Lakeshore Road Spur in the PM peak. Involves widening, ROW, and new

three-color signal. Route 31 EB left is LOS A with a queue length of 0'. It will be difficult for the residential driveways to exit left near the intersection. Seems to work better than other four proposed alternatives.

NYSDOT Alternative C2: Alternative C but widen Route 31 on the north side to have a 2<sup>nd</sup> WB through lane from Lakeshore Road to just east of Lakeshore Road Spur intersection (approx. 175' to east). Impacts ROW.

Intersection LOS A (8.2) in AM and LOS A (5.2) in PM for Route 31 @ Lakeshore Road. All turning movements are a LOS C or better, with no queue length longer than 197'. Route 31 EB left is LOS A with a queue length of 0'.

Intersection LOS B (11.1) in AM and LOS B (10.3) in PM for Route 31 @ Lakeshore Road Spur intersection. Route 31 WB thru is LOS B with a queue length 184'. ICO LOS is A with 0.53 in PM.

**Alternative D –** The left turn from NYS Route 31 eastbound to Lakeshore Road will remain at its existing location. Lakeshore Road westbound will be terminated at the Lakeshore Road Spur. Lakeshore Road westbound motorists will take a left turn after stopping, on to the Lakeshore Road Spur. Once on Lakeshore Road Spur, the southbound right will be channelized to provide a free flow condition on the NYS Route 31. Widening will take place on the north side between the Lakeshore Road Spur and Lakeshore Road which will require right-of-way. Another option to this is to provide a double right from the Lakeshore Road Spur and widen NYS Route 31 westbound east of the Lakeshore Road Spur intersection. The NYS Route 31 eastbound through movement will free flow at the Lakeshore Road intersection.

Alternative D: Intersection LOS A (1.3) in AM and LOS C (16.7) in PM. Route 31 EB left turn is LOS F with queue length of 425' in PM peak. Involves widening and ROW. Safety concerns for Route 31 WB left turns make a turn across two lanes, along with anticipating gaps from the slip ramp at Lakeshore Road Spur. Multiple approaches need to stop at the Lakeshore Road and Lakeshore Road Spur intersection. Does not address the Route 31 EB left turn queue backups but will make them worse with this alternative.

**Alternative E –** Lakeshore Road would be a cul-de sac at NYS Route 31. All Lakeshore Road westbound traffic will turn left at the Lakeshore Spur Road. Lakeshore Road eastbound traffic will also turn at the Lakeshore Road Spur signalized intersection. The southbound right along the Lakeshore Road Spur be channelized to provide a free flow condition on the NYS Route 31 westbound. Widening will take place on the north side between the Lakeshore Spur Road and Lakeshore Road which will require right-of-way. The option to this is to provide a double right from the Lakeshore Road Spur and widen NYS Route 31 westbound east of the Lakeshore Road Spur intersection. The left turn movement from Lakeshore Road westbound onto the Lakeshore Road Spur is assumed to be free flow, but additional signage will be needed to alert motorists that the road is a cul-de-sac at NYS Route 31.

Alternative E: Intersection LOS A (0.6) in AM and LOS C (27.6) in PM. In the PM, Route 31 WB left turn is LOS E with queue length of #487', Route 31 WB thru has a queue length of #677', NB approach a LOS E with #1195' queue. Involves significant widening and ROW. Not in favor of a free flow left onto Lakeshore Road Spur, then another right turn slip ramp to get to into Route 31.

Black Font = Proposed Mitigation by JMT  
Blue Font = Additional NYSDOT mitigation

## **SUMMARY OF MITIGATION: OPTION 1 – DUAL LEFT TURN LANES**

1. NYS Route 31 @ Henry Clay Boulevard:
  - Construct a northbound left turn lane.
2. NYS Route 31 @ Caughdenoy Road:
  - Further evaluate site plan and truck egress/ingress to see if turn lanes are required at this intersection.
3. NYS Route 31 @ US Route 11:
  - Construct an additional left turn lane to provide for westbound dual left turn lane and modify left turn phasing from permissive/protective to protected only.
  - Signal modifications should include upgrading to video detection to maximize the timing efficiency.



- The SE corner of the intersection may need to be widened to receive a westbound dual left turn lane.
- Lengthen the storage for the two (2) Route 31 EB thru lanes at Route 11 to handle the additional queue length from the additional new trips destined to the I-81 SB on-ramp.
- 4. Route 31 (Between Route 11 and I-81 SB Ramps)
  - Modify commercial driveways in this section (both north and south side) to operate as a right-in/right-out, which may also involve improvements to their connection to Crabtree lane
  - To address the existing crash patterns and enhance operations in this section, install a narrow-curbed median from the Route 11 at Route 31 intersection to the Route 31 @ I-81 SB Ramp intersection.
- 5. NYS Route 31 at I-81 Southbound Ramps:
  - Construct an additional left turn lane to provide westbound double left turn lanes and change westbound left turn phasing from permissive/protected to protected only, and widen to two lanes on the on-ramp before merging to a single lane prior to the merge on I-81.
  - Construct a signalized right turn slip ramp on Route 31 for the I-81 SB on-ramp (100-150' storage). This will involve closing Crabtree Lane at Route 31. The right turn will be a protected only.
  - Modify signal, sign, and pavement markings on the I-81 SB off-ramp to have no through movement. The approach will only have a designated left and right turn only lane.
  - Replace existing signal with new three-color signal.
- 6. NYS Route 31 at I-81 Northbound/Pardee Road:
  - On I-81 northbound off ramp construct an additional left and right turn lane. The storage length of the new NB right turn lane needs to increase from 125' to 350' +/- to accommodate the 95<sup>th</sup> percentile queue length.
  - Replace existing signal with new three-color signal.
  - Install advance overhead guide signs on I-81 NB off-ramp approach to signal.
  - Modify Route 31 WB left turn phasing from protective/permissive to protective-only phasing to address the left turn crash pattern.
  - To address the existing crash patterns and enhance operations in this section, install a narrow-curbed median from the Route 31 at I-81 NB to the Route 31 @ Lakeshore Road intersection.
  - Convert center TWLT lane to an WB thru lane so vehicles destined for the I-81 SB Ramp are aligned with the left turn lane underneath the bridge. This lane would then transition to the EB left turn lane needed for Lakeshore Road or at Lakeshore Road Spur intersection for either Alternative A2 or C2.
- 7. NYS Route 31 at Site Entrance 2:
  - An addition of a EB left turn lane and a WB right turn lane along NYS Route 31 at the site entrance.
  - A left and right turn will be provided out of the site, along with a new three-color signal.
- 8. Caughdenoy Road at Site Entrance 1:
  - A right and left turn lane will be provided from the site entrance and along Caughdenoy Rd.
- 9. NYS Route 31 at Lakeshore Road:
  - Concepts have been developed and coordination will take place with NYSDOT for future consideration. Recommend either Option A2 or C2. Pros and cons to both
- 10. NYS Route 481 at Caughdenoy Road and Maple Road
  - Intersection improvements to address additional traffic and safety concerns.

Black Font = Proposed Mitigation by JMT  
Blue Font = Additional NYSDOT mitigation

## **SUMMARY OF MITIGATION: OPTION 2 – SINGLE LEFT TURN LANES**

1. NYS Route 31 @ Henry Clay Boulevard:
  - Construct a northbound left turn lane.
2. NYS Route 31 @ Caughdenoy Road:
  - Further evaluate site plan and truck egress/ingress to see if turn lanes are required at this intersection.
3. NYS Route 31 @ US Route 11:
  - Construct an additional NB Route 11 right turn lane (125' Min).
  - Convert one of the NB receiving lanes on northern leg to a short SB Route 11 left turn lane.
  - Signal modifications include split phasing both Route 11 approaches & upgrading to video detection.
  - Lengthen the storage for the two (2) Route 31 EB thru lanes at Route 11 to handle the additional queue length from the additional new trips destined to the I-81 SB on-ramp.
4. Route 31 (Between Route 11 and I-81 SB Ramps)

- Modify commercial driveways in this section (both north and south side) to operate as a right-in/right-out, which may also involve improvements to their connection to Crabtree lane
  - To address the existing crash patterns and enhance operations in this section, install a narrow-curbed median from the Route 11 at Route 31 intersection to the Route 31 @ I-81 SB Ramp intersection.
5. NYS Route 31 at I-81 Southbound Ramps:
- Construct an additional lane underneath bridge so both Route 31 left turn lanes (WB left turn for I-81 SB on-ramp and EB left turn for Pardee Rd.) are side by side to maximize storage capacity.
  - Widen the EB approach to have a dedicated 650' right turn slip ramp that free flows onto the on-ramp. Widen to two lanes on the on-ramp before merging to a single lane prior to the merge on I-81.
  - Modify signal, sign, and pavement markings on the I-81 SB off-ramp to have no through movement. The approach will only have a designated left and right turn only lane.
  - Replace existing signal with new three-color signal. One controller for both signals near bridge.
6. NYS Route 31 at I-81 Northbound/Pardee Road:
- On I-81 northbound off ramp construct an additional left and right turn lane. The storage length of the new NB right turn lane needs to increase from 125' to 350' +/- to accommodate the 95<sup>th</sup> percentile queue length.
  - Replace existing signal with new three-color signal. One controller for both signals near bridge.
  - Install advance overhead guide signs on I-81 NB off-ramp approach to signal.
  - Modify Route 31 WB left turn phasing from protective/permissive to protective-only phasing to address the left turn crash pattern.
  - To address the existing crash patterns and enhance operations in this section, install a narrow-curbed median from the Route 31 at I-81 NB to the Route 31 @ Lakeshore Road intersection.
  - Convert center TWLT lane to an WB thru lane so vehicles destined for the I-81 SB Ramp are aligned with the left turn lane underneath the bridge. This lane would then transition to the EB left turn lane needed for Lakeshore Road or at Lakeshore Road Spur intersection for either Alternative A2 or C2.
7. NYS Route 31 at Site Entrance 2:
- An addition of a EB left turn lane and a WB right turn lane along NYS Route 31 at the site entrance.
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8. Caughdenoy Road at Site Entrance 1:
- A right and left turn lane will be provided from the site entrance and along Caughdenoy Rd.
9. NYS Route 31 at Lakeshore Road:
- Concepts have been developed and coordination will take place with NYSDOT for future consideration. Recommend either Option A2 or C2. Pros and cons to both.
10. NYS Route 481 at Caughdenoy Road and Maple Road
- Intersection improvements to address additional traffic and safety concerns.

**In analyzing the two options for mitigation, NYSDOT recommends progressing Option 2 – Single Left Turn Lanes.**

**Notice of SEQRA Public Hearing White Pine Commerce Park - Demand for an In- Person meeting, Not a Zoom**

Moe Moe Libmatt &lt;mattticket@yahoo.com&gt;

Sat 5/8/2021 10:36 AM

To: ED - Web 1 <economicdevelopment@ongov.net>; County Executive <CountyExecutive@ongov.net>; bfmay6 <bfmay6@yahoo.com>; jjrowley@aol.com <jjrowley@aol.com>; Tim Burtis <tburtis@hotmail.com>; Judith Tassone <tassone@twcny.rr.com>; debjcody@gmail.com <debjcody@gmail.com>; Julie Abbott-Kenan <julieabbottkenan@gmail.com>; Mary Kuhn <MaryKuhn@ongov.net>; Chris Ryan <cjryan1123@yahoo.com>; peggychase2013@twcny.rr.com <peggychase2013@twcny.rr.com>; kevinholmquist@reagan.com <kevinholmquist@reagan.com>; lmcbrid1@twcny.rr.com <lmcbrid1@twcny.rr.com>; dknappmb@aol.com <dknappmb@aol.com>; kenbushjr@gmail.com <kenbushjr@gmail.com>; ckell1251@gmail.com <ckell1251@gmail.com>; wtkinne@gmail.com <wtkinne@gmail.com>; mannjr\_1983@hotmail.com <mannjr\_1983@hotmail.com>; Linda Ervin <LindaErvin@ongov.net>; mannion@nysenate.gov <mannion@nysenate.gov>

**NOTICE:** This email originated from outside of Onondaga County's email system. **Use caution** with links and attachments.

To All attached in this email,

I am one of the unavoidable adverse impacts, as I am a Burnet Road resident.

In watching channel 9 the other morning, May 6th, it was reported that our COVID numbers are down. 1.4 % and under 3% State wide. People have been working. Things are opening. I do not accept your announcement of a Zoom Meeting for this 1,253 acre SEQRA Study. I demand an In-Person meeting, announced to all the Clay residents.

County Exec. Ryan McMahon met with the residents of Burnet Road last October 22, 2020 at the Clay Town Hall when COVID numbers were worse than they are now! It does not make sense to me that something as HUGE and important as this subject would not be an In-Person Public meeting. COVID Convenience, I call it. Insults my intelligence. The Town Hall in Clay can't make accommodations in regards to mask wearing and social distancing in order to give us our time on the podium? How many of you have gone to the gym? Or out to a restaurant? Or hair Salon? Yet, you can not meet with Clay residents to go over your findings and give us our opportunity to speak? Shameful.

I see that written comments from the public will be accepted by OCIDA until June 11, 2021 and may be submitted to them at Onondaga County Industrial Development Agency Robert Petrovich, Executive Director  
333 West Washington Street, Suite 130 Syracuse, New York 13202  
or via email to economicdevelopment@ongov.net.

In Summary, Do the right thing and give us the In-Person meeting.

You intend to force me out-give me the opportunity to fight for my home and the animals and wetlands and Oneida Lake and Clay as I know it.

Respectfully,  
Maureen Matthews



Hillside  
STRONGER FUTURE

Hillside  
Syracuse NY

July 7, 2021

John McMahon II  
Onondaga County  
Montgomery  
Syracuse, New York

Hon. Mr. McMahon

It was a pleasure  
to meet the people of Syracuse  
and their families of our community.

For more than  
a decade, we have  
inhibited success  
around the  
issues - <https://www.oseda.org>

The results  
show a percent of  
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economic

With the  
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# IMPORTANT MESSAGE

FOR \_\_\_\_\_  
DATE 5/8 TIME 11:15 A.M.  
M Carrie Eckert  
OF Clay Town Resident  
PHONE 315.882.8958  
AREA CODE NUMBER EXTENSION

☐ FAX  
☐ MOBILE  
AREA CODE NUMBER TIME TO CALL

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	WILL FAX YOU	<input type="checkbox"/>

MESSAGE OSEDA has not  
let the Clay residents  
gather for a public  
forum re: Micro chip  
factory in the town  
of Clay  
SIGNED \_\_\_\_\_

universal UNV48005

MADE IN U.S.A.



Robert M. Petrovich  
Director-Office of Economic Development  
Executive Director-Industrial Development Agency  
Onondaga County  
333 West Washington Street  
Syracuse, New York 13202  
315 435 3770  
[RobertPetrovich@ongov.net](mailto:RobertPetrovich@ongov.net)

---

**From:** Cody Kelly <[ckell1251@gmail.com](mailto:ckell1251@gmail.com)>

**Sent:** Monday, May 10, 2021 11:37 AM

**To:** Robert Petrovich <[RobertPetrovich@ongov.net](mailto:RobertPetrovich@ongov.net)>

**Subject:** Fwd: Notice of SEQRA Public Hearing White Pine Commerce Park - Demand for an In- Person meeting, Not a Zoom

**NOTICE:** This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

Hey Bob,

Is it possible to organize this White Pine SGEIS hearing in person, rather than Zoom? I'd be happy to help coordinate with the Clay Town Hall. I think it's a reasonable request (although I may have gone about it a little differently!)

Let me know.

Cody Kelly  
315-420-5792

Sent from my iPhone

Begin forwarded message:

**From:** Moe Moe Libmatt <[mattticket@yahoo.com](mailto:mattticket@yahoo.com)>  
**Date:** May 8, 2021 at 10:36:06 AM EDT  
**To:** [economicdevelopment@ongov.net](mailto:economicdevelopment@ongov.net), [countyexecutive@ongov.net](mailto:countyexecutive@ongov.net), [bfbmay6@yahoo.com](mailto:bfbmay6@yahoo.com), [jjrowley@aol.com](mailto:jjrowley@aol.com), [tburtis@hotmail.com](mailto:tburtis@hotmail.com), [tassone@twcnny.rr.com](mailto:tassone@twcnny.rr.com), [debjcody@gmail.com](mailto:debjcody@gmail.com), [julieabbottkenan@gmail.com](mailto:julieabbottkenan@gmail.com), [marykuhn@ongov.net](mailto:marykuhn@ongov.net), [cjryan1123@yahoo.com](mailto:cjryan1123@yahoo.com), [peggychase2013@twcnny.rr.com](mailto:peggychase2013@twcnny.rr.com), [kevinholmquist@reagan.com](mailto:kevinholmquist@reagan.com), [lmcbid1@twcnny.rr.com](mailto:lmcbid1@twcnny.rr.com), [dknappmb@aol.com](mailto:dknappmb@aol.com), [kenbushjr@gmail.com](mailto:kenbushjr@gmail.com), [ckell1251@gmail.com](mailto:ckell1251@gmail.com), [wtkinne@gmail.com](mailto:wtkinne@gmail.com), [mannjr\\_1983@hotmail.com](mailto:mannjr_1983@hotmail.com), [lindaervin@ongov.net](mailto:lindaervin@ongov.net), [mannon@nysenate.gov](mailto:mannon@nysenate.gov), [StirpeA@nyassembly.gov](mailto:StirpeA@nyassembly.gov), Shanelle Benson Reid <[vote@friendsofdrshanelle.com](mailto:vote@friendsofdrshanelle.com)>, Michelle <[mnuzzo80@yahoo.com](mailto:mnuzzo80@yahoo.com)>  
**Subject:** Notice of SEQRA Public Hearing White Pine Commerce Park - Demand for an In- Person meeting, Not a Zoom

To All attached in this email,

I am one of the unavoidable adverse impacts, as I am a Burnet Road resident.

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333 West Washington Street, Suite 130 Syracuse, New York 13202  
or via email to [economicdevelopment@ongov.net](mailto:economicdevelopment@ongov.net).

In Summary, Do the right thing and give us the In-Person meeting.  
You intend to force me out-give me the opportunity to fight for my home and the animals  
and wetlands and Oneida Lake and Clay as I know it.


Respectfully,  
Maureen Matthews

**Statement from OCC President**

Tormey,Susan <tormeys@sunyocc.edu>

Thu 5/20/2021 2:53 PM

To: ED - Web 1 <economicdevelopment@ongov.net>

 1 attachments (75 KB)

Statement - Dr. Casey Crabill OCC.docx

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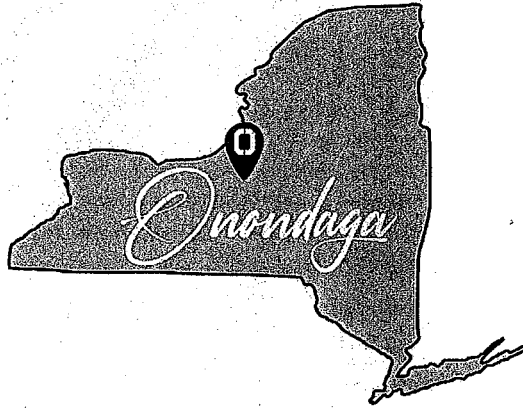
Office of Economic Development/OCIDA  
Onondaga County

Attached please find a statement from OCC President Casey E. Crabill to be entered as part of the SEQR public hearing scheduled for Monday May 24, 2021.

Thank you.

Susan Tormey

Susan J. Tormey  
Associate Vice President  
Advancement Communications  
Onondaga Community College  
4585 West Seneca Turnpike  
Syracuse, New York 13215  
[tormeys@sunyocc.edu](mailto:tormeys@sunyocc.edu)  
Office: 315-498-2764  
Cell: 315-263-0958



Statement from  
Casey E. Crabill, Ed.D.  
President  
Onondaga Community College

*Onondaga Community College is proud to work with local businesses and corporations, small and large, across our region to provide valuable certificates, needed training, and areas of study for current and potential employees.*

*We are excited about initiatives like Sen. Chuck Schumer's Endless Frontier Act and about a commitment from the federal government to help attract exciting state of the art companies to areas in Onondaga County like the White Pine Business Park. Onondaga Community College will sustain its pledge to assist with developing the best prepared workforce, including meeting specific training needs, to support prosperity in our region.*

May 20, 2021



May 20, 2021

Onondaga County Economic Development  
333 W. Washington Street  
Suite 130  
Syracuse, New York, 13202

To Whom It May Concern:

As the leading research university and largest private employer in Central New York, Syracuse University is committed to participating in regional economic development initiatives positioned to benefit our community, and all those who call Central New York home.

Syracuse University's investment in research and development is significant, and research-based collaborations between the academic and private sectors represent a powerful tool to advance new opportunity for our region. Specifically, policy experts have long understood the strong and positive relationship that exists between investments in research and economic growth. Importantly, those benefits go beyond economic indicators like new jobs and increased wages - but also extend to enhanced social and educational opportunities for members of the community.

For that reason, Syracuse University supports Onondaga County's ongoing efforts - to include at the White Pines Commerce Park - to attract new and cutting-edge technology and manufacturing ventures to Central New York. These efforts are positioned to confer significant benefits to the region, including new jobs and inclusive economic growth. In addition, unique to our region are the potential benefits of collaborations between academic and private-sector researchers, in fields such as Quantum Technology, Artificial Intelligence, and Information Systems. These are areas where Syracuse University has made extraordinary investments over the past several years, and thus attracting business ventures to the region that are also pursuing commercial opportunities in these fields has potentially synergistic and transformative implications for the region, positioning CNY as a national leader in the development and commercialization of future-focused technology and advanced manufacturing.

In conclusion, Syracuse University believes that Onondaga County's ongoing efforts to position the White Pines Commerce Park as a mechanism to attract new and research-intensive employers to our region is central to ensuring the long-term economic welfare of Central New York. We commit to be an engaged partner in those efforts, where the benefits of economic development serve to advance opportunity for all members of our community.

Sincerely,

A handwritten signature in black ink that reads 'J. Michael Haynie'. The signature is written in a cursive, flowing style.

J. Michael Haynie  
Vice Chancellor  
Syracuse, New York, 13244

---

**From:** Ashley Wells <[awells@twcny.rr.com](mailto:awells@twcny.rr.com)>  
**Sent:** Monday, May 24, 2021 8:09 PM  
**To:** ED - Web 1 <[economicdevelopment@ongov.net](mailto:economicdevelopment@ongov.net)>  
**Subject:** White Plains Park Objection

---

**NOTICE:** This email originated from outside of Onondaga County's email system. Use **caution** with links and attachments.

---

To whom it may concern

I am writing you as a community member who is opposed to the White Plains project. We do not live far from where this monstrosity will be built.

We moved to rural part of Clay 5 years ago. We relocated here from Northern Oswego County because it's the happy medium between country and suburban living.

We couldn't imagine being anywhere else. If this were to be built here we would sell and completely leave NYS as there is no where else we want to be.

We also don't want something so environmentally damaging being so close to our children. I don't want them breathing in those emissions and I don't want to have to deal with all the traffic taking them to their extra curriculars. I also couldn't imagine losing all the beautiful sights and country feel Caudgnoy Rd has to offer on my drive home to and from work. It's truly peaceful and my happy place along with so many others in this area.... If we wanted to deal with all of these negative things we would live in the city. We didn't for that exact reason.

I don't understand how businesses can force this on a community when there are so many vacant buildings in the surrounding areas. It's a joke. Great Northern Mall and Shopping town are both vacant, most of the old manufacturing plants in East Syracuse have left and Destiny USA isn't far behind on make the list. My point is there are more options on reusing already built vacant buildings than kicking people out of their homes and running a community to build a new one. It's completely ridiculous and let's face it. NYS is clearly not a good place for any manufacturing companies. Carrier and Chrysler are 2 huge examples of failing manufacturing in NYS. Don't let this happen; it will fail and then not only will you have another vacant lot, you'll have more people out of jobs and a loss in tax revenue from all the people who used to live there and could have been paying all along.

Thanks for your time and I really hope this doesn't pass.





**GSAR** Greater Syracuse  
Association of REALTORS®  
www.cnyrealtor.com

May 24, 2021

To the Onondaga County Executive, Ryan McMahon,

On behalf of the 1,700 members of the Greater Syracuse Association of REALTORS®, we commend County Executive Ryan McMahon for his leadership in working to bring much-needed economic development to Onondaga County.

If our communities are going to flourish, we know there must be a continued focus on economic development by our government leaders, especially as we put the pandemic behind us. REALTORS® applaud our county leaders for keeping focused on the future. Business development is the key step in rebuilding our employment base and reversing the population loss of the past decade. It is vital that an environment is created where our residents can see a thriving future here in our county.

All county residents benefit through the introduction of new businesses into our communities through the jobs they create and the resulting boost they give our local economy. In turn, those jobs allow our Onondaga County residents to build their future and achieve the American Dream of Homeownership right here, rather than chasing their dreams elsewhere. In turn, our new homeowners further contribute to the local economy as they purchase goods and services to create their “Home Sweet Home” in Baldwinsville, Clay, Syracuse and all of our other municipalities.

The Greater Syracuse Association of REALTORS and its members stand ready to assist our government and the communities we live in by supporting efforts to grow our business base and economy.

Sincerely,

Lynnore Fetyko  
GSAR CEO

Andy Azzarello  
GSAR President

2021 OFFICERS

President	President-Elect	Secretary/Treasurer	Ex-Officio	Chief Executive Officer
Andy Azzarello	Nancy Quigg	Shauna Teelin	Chris Teelin	Lynnore Fetyko

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5958 East Taft Road, North Syracuse, NY 13212 • Phone: 315.457.5979 • Fax: 315.457.5884





May 24, 2021

Mr. Robert Petrovitch  
Executive Director  
Onondaga County Industrial Development Agency  
333 West Washington Street, Suite 130  
Syracuse, New York 13202

Dear Mr. Petrovitch,

I am writing in support of the Generic Environmental Impact Statement (GEIS) adopted by your organization for the future development of White Pine Commerce Park. I have read the report and believe the Onondaga County Industrial Development Agency has done a complete and thorough review of all the alternatives available. Expanding White Pine Commerce Park gives our region an economic opportunity that will be transformative.

The site has the characteristics needed for a high-tech facility including power quality and capacity, water, proximity to markets and transportation alternatives. Central New York has a long history of innovation and adding a semiconductor manufacturer will lead to further innovation and attract other manufacturers key to the industry.

As the owner of a recruiting firm, I can say without hesitation that this kind of opportunity will be very attractive to highly skilled talent seeking to advance their careers. Central New York has much to offer in the way of moderate housing prices, excellent schools and four seasons to enjoy. Additional career opportunities will help our region grow and compete with other high-tech areas of the country.

Many years of effort have gone into developing the site and marketing our region for just this kind of opportunity. I am very hopeful we will be successful in attracting an investment of this magnitude.

Sincerely,

A handwritten signature in black ink that reads 'Susan Crossett'. The signature is fluid and cursive, with the first name 'Susan' and last name 'Crossett' clearly visible.

Susan Crossett  
CEO

**Objection to White Plains Business Park**

Ashley Wells &lt;awells@twcny.rr.com&gt;

Tue 5/25/2021 10:51 AM

To: County Executive &lt;CountyExecutive@ongov.net&gt;

Cc: ED - Web 1 &lt;economicdevelopment@ongov.net&gt;

**NOTICE:** This email originated from outside of Onondaga County's email system. **Use caution** with links and attachments.

To whom it may concern,

I am writing you in objection to the White Plains Business Park.

I am a local resident and do not want this eye sore anywhere near my house. I don't want my children breathing the emissions it will give off and I certainly do not want my children fishing out of the river and lake (which they LOVE to do and do often) the waste will be dumped into. We moved to rural Clay for that reason. It offers a country setting along with the convince of suburban life; truly a happy medium.

This monstrosity has no business being here in Clay. I understand from a business perspective it would create jobs which obviously equals revenue. But has anyone even thought about how long will that really last? Manufacturing doesn't survive here in NYS. Look at Chrysler and Carrier. Both provided very well paying jobs to just leave NYS all together and create a HUGE empty eye sore in East Syracuse and also create a huge tax deficit. Why do that to such a beautiful area. Another example: Great Northern Mall. It's pretty much completely vacant, I don't understand why that can't be demoed and something put in there. Utilize the space the is already taken. What happened to communities going green to save the environment? You really thing building this is going to achieve that. The emissions and waste coming from a plant like that does the exact opposite. Also, a lot of the properties around rural Clay but up to nature preserves. What happens to them? Yes I'm that property will remain un-touched, but all the wild life that is in there will be effected by this along with the health and safety of the residents and children.

WE DON'T WANT THIS FOR OUR LEGACY (meaning our children)!!!!!!! We don't want to move away from family and friends and everything we love. This will force us to do so because we don't want to raise our children around something like this!!!! We love nature, hunting and fishing all of which we can do and close to home which is what we wanted and how we chose to raise our children. How can you take that dream away from people??? The greed with this is disgusting.

For what it's worth, we don't even live on Burnet Rd but we are close enough to be greatly impacted!!!

This has no place being in Clay, NY. There are plenty of other places this can go in Onondaga County, but Clay NY should not be one of them

Thank you for your time

**Proposed Industrial Development in Clay**

millspiper@juno.com &lt;millspiper@juno.com&gt;

Mon 5/24/2021 2:16 PM

To: ED - Web 1 &lt;economicdevelopment@ongov.net&gt;

**NOTICE:** This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

Members of Onondaga County Office of Economic Development,

I'm STRONGLY opposed to an Industrial Park in the Town of Clay. You will receive many emails and phone calls detailing all the issues such a project will inject on our community. I hope you read all of them.

I am mostly opposed to the secrecy in which this project is shrouded. Tell the public in an open meeting that this project will encompass 4 million square feet of buildings and 50 acres of paved area. It will be half the size of Onondaga Lake.

Let all the residents of the Towns of Cicero and Clay know how their lives will be affected. Residents of Burnet Road will be affected the most; however, a project of this magnitude will greatly affect everyone. Tell the residents how traffic will increase. Tell them where you plan to widen roads to deal with this traffic, decreasing their front yards. Tell them how there will be an increase in noise, air, and water pollution. Tell them how this project will be funded.

Be forth coming with your intentions. Once people are aware of the size and magnitude of this project, they will be telling you NO, as well.

Sincerely,  
Darlene Piper  
106 1/2 Northfield Drive  
North Syracuse, NY 13212

---

Top News - Sponsored By Newser


- **Biden Condemns 'Despicable' Rise in Anti-Jewish Attacks**
- **Suit: Pompeo Vowed to Pay Legal Fees. Then 'Everything Changed'**
- **NYC Mayor Makes Big Call on Schools: 'It's Time'**

**Maureen Matthews comments and questions for the Public comment period May 24th, 2021**

Moe Moe Libmatt <mattticket@yahoo.com>

Wed 5/26/2021 8:34 PM

To: ED - Web 1 <economicdevelopment@ongov.net>; Cody Kelly <ckell1251@gmail.com>; neilgingoldlaw@gmail.com <neilgingoldlaw@gmail.com>; Michelle <mnuzzo80@yahoo.com>; Shanelle Benson Reid <vote@friendsofdrshanelle.com>

 1 attachments (21 MB)

Comments SEQR Review for comment period FINAL befor June 11th 2021.rtf;

**NOTICE:** This email originated from outside of Onondaga County's email system. **Use caution** with links and attachments.

OCIDA and Jeff Davis,

Please find attached, a document with comments and questions related to the SEQR Review on the proposed 1,253 acre White Pine Commerce Park.

These questions and comments are being submitted after the May 24, 2021 Public Comment Period that was a Zoom meeting, as opposed to an in-person meeting.

Additional questions and comments are being accepted until June 11th, 2021 according to your site.

Thank you for your consideration.

Respectfully,  
Maureen Matthews  
Resident of Burnet Road

Revised Final

May 26, 2021

Onondaga County Industrial Development Agency

Responding to: 5/6/21 Recording of OCIDA special meeting held this morning regarding the EIS  
PUBLIC COMMENT for April 29th and May 6, 2021. SEQRA meetings: Open comment period.

OCIDA Attempted Acquisitions of Homes and 1,253 acres of land

White Pine Commerce Park -

April 29, 2021 initial meeting, **'We do not have a project' , ' We do not have an applicant that has put forth what they want to do yet'.**

\_\_\_\_\_ Tell me how you can do a review studying for the impacts of a particular Company/Business when you currently, as stated above, have a mystery company? Isn't it a fact, that you need to do the study based on the actual company that has signed? This doesn't make sense. If you don't know the company's outputs of chemicals or the type of business and wastes etc it will produce, I ask you how this review can be complete at this time.

\_\_\_\_\_ What then, was the basis for the review on such a large parcel? Such as, Who/What business did you mirror to conduct this? \_\_\_\_\_ Are there any other structures in Upstate NY that are 4 million square feet of building on approx. 1.9 square miles? \_\_\_\_\_ Did you mirror a business or company in another state? \_\_\_\_\_ Did you mirror a business or company in another Country? If you did, how would the soils and wetlands and air quality and environmentals and species of animals match to White Pine to get your assumptions accurately?

\_\_\_\_\_ How much of the public's taxpayer money has been involved since the beginning of this project?

\_\_\_\_\_ Why the name change from Clay Business Park?

\_\_\_\_\_ How much money was involved to pay for the new name change?

\_\_\_\_\_ Why were our Legislators told to stay out of this?

The lead Agency in this a non-government unelected organization.

\_\_\_\_\_ How would a non-government organization have the right to use eminent domain against a homeowner? They are an independent agency?

The Onondaga County Industrial Development Agency (OCIDA) is an independent public benefit corporation established in 1970.

The definition Of OCIDA as a no-govenment agency : A non-governmental organization (NGO) is a non-profit group that functions independently of any government. NGOs, sometimes called civil societies, are organized on community, national and international levels to serve a social or political goal such as humanitarian causes or the environment.

\_\_\_\_\_ You are proposing to destroy 1,253 acres of virgin land, 2 square miles, of Residential/ Agricultural and displacing homeowners. Yet, not a positive declaration?

\_\_\_\_\_ Why not Town of Clay, DEC, DOT with all the traffic issues being the main adverse effect most potential impact? -

\_\_\_\_\_ Who has the right to execute eminent domain?

\_\_\_\_\_ There is a large parcel of available land to the West of Burnet Road zoned Industrial. How are you able to threaten Residential/ Ag neighbors when you have Industrial land where you need to build? The West side of Caughdenoy has 17 acres with the best soils. ( To be clear, I do not want it over there either. I oppose a massive semiconductor development in Clay - Period !)

\_\_\_\_\_ Is there a tax break ?

\_\_\_\_\_ How BIG is this TAXBREAK for this unnamed company we are potentially losing our lifelong homes and properties to?

\_\_\_\_\_ Are there any mitigated wetlands offsite or other environmental manipulations (mitigating offsite- that usually doesn't work as it backs up, has problems and issues somewhere else -it has been an experience that has been witnessed first hand when a house was built just South of my property. My property flooded)

\_\_\_\_\_ I am STRONGLY against mitigating off-site. How will you mitigate on-site?

\_\_\_\_\_ How about the impact of widening the roads and other homeowners homes and properties lost which is IGNORED BY SEQRA?

\_\_\_\_\_ Why is it ignored in SEQRA?

Waste water sewer: \_\_\_\_\_ What is the cost ( all of it, all organizations that would be involved to make it happen ) to increase service to an Industrial Facility that taxpayers will pay for when many are incurring increased assessments?

\_\_\_\_\_ Attorney Jeff Davis & JMT Consultants had a negative declaration 2021 after 2013's positive declaration on original 336 acres. How in the world can a review on 1,253 acres not have positive impact just 7 years later on more wetland and animals and homes and homeowners? Assumptions? Regarding Jeff Davis' statement below :

Jeff Davis stated we are declaring by issuing a positive declaration that we are saying there is a potential for significant environmental impact for future development for this area and we are going to study it.

According to: Subject to Board Approval

Onondaga County Industrial Development Agency

Regular Meeting Minutes from Dec. 8, 2020 via Zoom Teleconference

#### WHITE PINE ENVIRONMENTAL REVIEW

Jeff Davis stated in 2013 the Agency completed a generic environmental impact statement studying potential development on the property and that included a parcel on White Pine Park that is 336 acres. He stated as discussed it is currently vacant and they have identified and learned that the park needs to be a larger area. He stated this Board has undertaken a process through acquisition of lands to do that, expand the park and consider acquiring more land. He stated the motion before the Board now is a reopening of the 2013 GEIS so that this Board can commence a similar generic environmental review of a larger White Pine Park area. He stated it will become the supplemental GEIS so the request before the Board is to issue a positive declaration under SEQR that will commence the process of notifying other agencies involved and interested that OCIDA plans to be lead agency for purposes of conducting a supplemental GEIS and we will send out notices to all involved and interested agencies of that intent. He stated they will have 30 days to comment and provide their consent to the Agency to be lead agency for this supplemental GEIS. He stated upon the completion of that 30 day period and assuming nobody objects OCIDA will then take on conducting a generic environmental review of an expanded White Pine Park up to 1,253 acres along the Caughdenoy Road/Route 31/Burnet Avenue corridor area and slightly east of Burnet Avenue. He stated the potential development of 1,253 acres would be studied in the same way that OCIDA studied the potential development and issue the GEIS in 2013. He stated there is no specific project at this time but a GEIS is an appropriate step taken when one is trying to develop a future high end business park like this and become shovel ready.

\_\_\_\_\_ Traffic intersection at Rt # 31 and Rt # 11 are failing with 'stacking' and long delays. When in the process would these be corrected? \_\_\_\_\_ Time as in YEAR and DATES

\_\_\_\_\_ What is The New York State Energy code which became effective on January 1, 1979 in this application?

Oak Orchard is a short distance away, I question it's carry capacity. \_\_\_\_\_ Explain how you will ensure carry capacity.

\_\_\_\_\_ Explain Buffers. There wouldn't be enough room to buffer this giant from neighbors so threaten to take them with the use of eminent domain? How much buffering would you need and how would you do the spec's on the area to buffer?

SEQR Public Hearing, May 24th at 6:00 p.m. not being an IN-PERSON meeting is appalling ! COVID is no longer an excuse. Everything is opening up. NYS is opening and restrictions lifted except for government? That should be the other way around - don't you think ? Supposedly we need government, that is why we have elected officials. Yet, The elected officials SHUT DOWN AND STAY SHUT DOWN to close off from the people that elected them. Once again, doesn't make sense.

\_\_\_\_\_ Why didn't you make a point to have an IN-PERSON meeting? What are you afraid of?



Explain why you do not want to listen to your constituents and the CLAY Community? This is a Mega Development and you won't allow us to voice our views because of COVID? This is ridiculous, absurd, ludicrous, nonsensical, and frankly, preposterous.

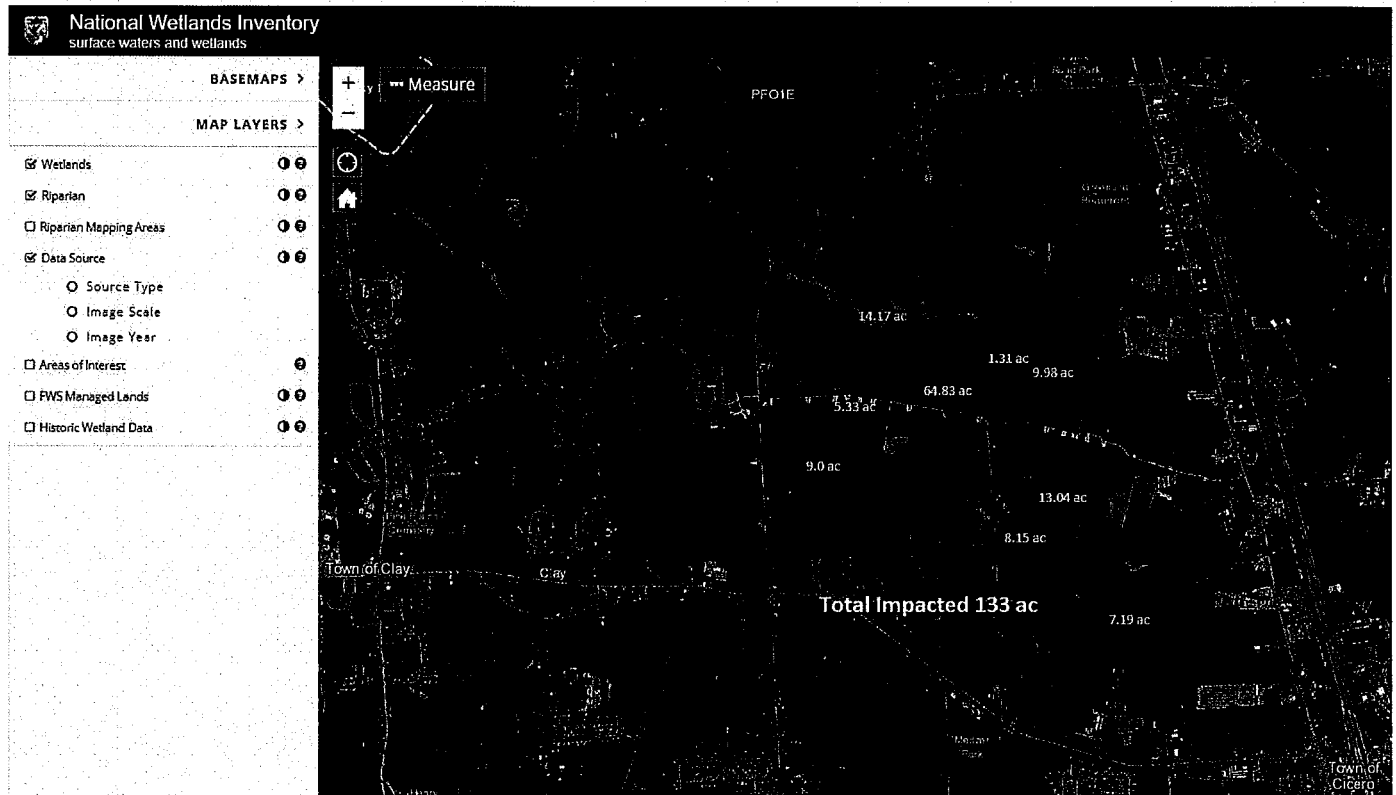
\_\_\_\_\_30 day comment period is not enough time to be able to address issues of 730 more acres on assumptions. Tell us how you will be addressing these comments?

You clearly stated, in the April 29, 2021 initial meeting, **'We do not have a project'**, 'You have the audacity to threaten residents and take homes after investing taxpayer dollars and simply state, 'We dont have a project', **We do not have an applicant that has put forth what they want to do yet'**. This doesn't make sense. Oh wait, OCIDA hired Ed Rogers to send letters to residents saying an 'entity' wants to purchase your home. Once purchase options were signed, ( by people never intending to sell their homes to **We do not have an applicant that has put forth what they want to do yet'**) OCIDA can lure the buyer. This makes it a voluntary purchase under fear of eminent domain! \_\_\_\_\_What right do you have to do this!

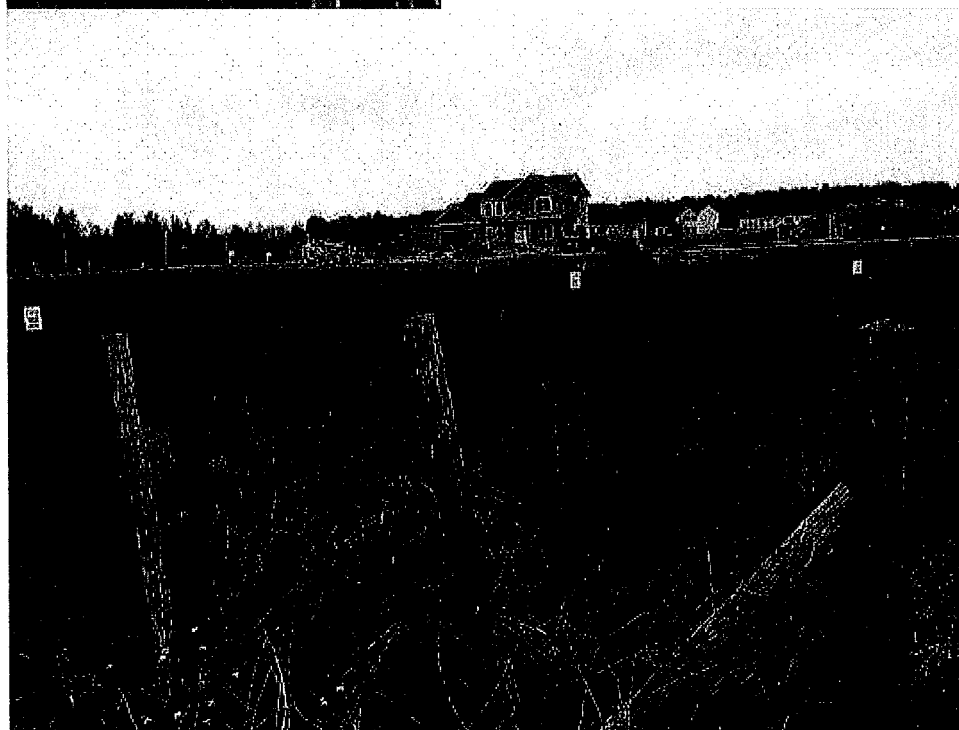
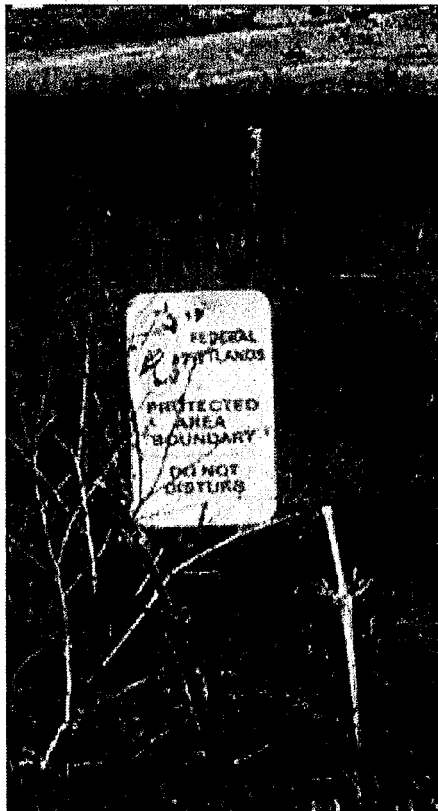
This is NOT a done deal. Wrong place! Move along where don't take people's homes!

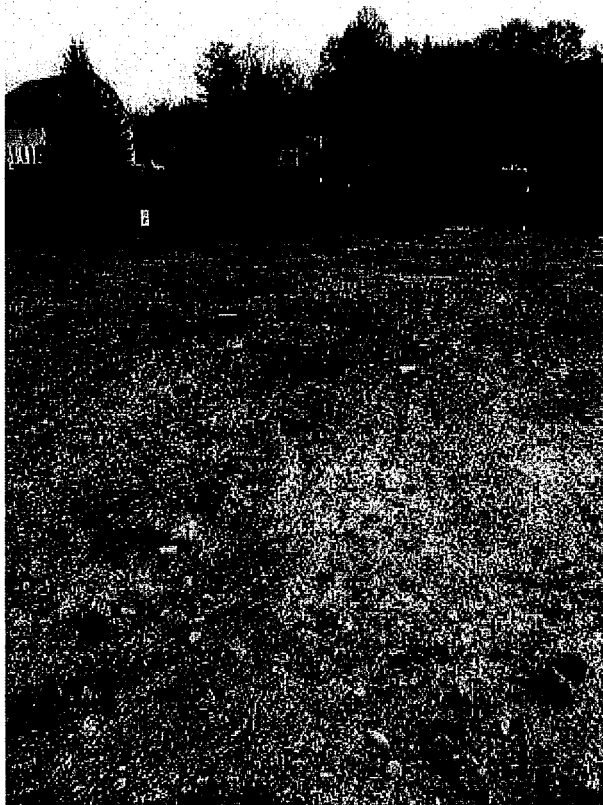
\_\_\_\_\_Is the document adequate for a public hearing, how can you do a traffic study for a mystery business? Oh wait, I know that answer - It is an ASSUMPTION. I want guarantee's Mr. Jeff Davis.

\_\_\_\_\_How much wetland destruction? How will you mitigate retention or detention ponds with 50 acres of paved surfaces that is a lot of impervious services effecting run off on others, then add a 4 million square foot building, manufacturing what products? You don't even know what products are if you don't know the project/business? How is that adequate for a public hearing? Explain that to us in DETAIL. \_\_\_\_\_I want a Detailed document explaining this. With all the mystery, how can there be any environmental oversight especially with traffic. Oh wait, I know that answer - It is an ASSUMPTION.

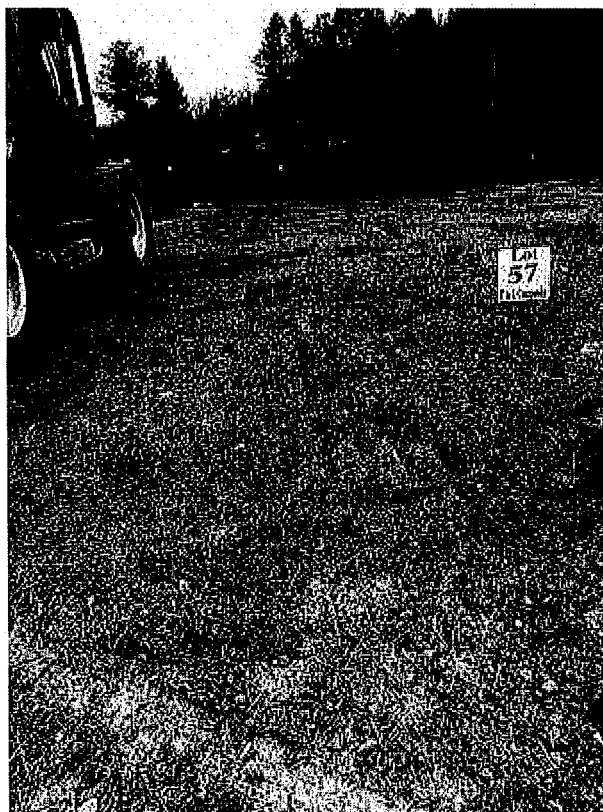


Concerns stem from other Federally Protected Wetlands. Near Cicero Swamp in Onondaga County on Cicero Center Road, this is an example of designated Federal Wetlands that is probably less than an acre in size. It is **contained** with 3 roads and a property and is surrounded by a new development. It is posted with 6 or 7 little signs in a rectangle shaped area. No where near adequate. Pic's as shown This raises genuine concerns of the handling of the wetlands in White Pine Park.





Note the white Fed Wetland signs in the background.



Note the white Fed Wetland signs in the background.



These wetlands are not looking Federally protected to me.

\_\_\_\_\_ Will this happen at White Pine?

\_\_\_\_\_ With 4 miles of new gas lines, who is paying that bill? Is this government funded? 5,000 linear feet from substation of underground electric, talk about sprawl. There is a lot of vacant land around here in a struggling economy, why take 37 homeowners homes (and more when roads widen etc) for overdevelopment in an area that has long-standing and ongoing traffic concerns? \_\_\_\_\_ Yes or No, is it because it is cheaper for you to buy out homeowners (threatening eminent domain) than buy land already zoned Industrial?

\_\_\_\_\_ Traffic study: I want a copy of the detailed portion of the traffic study where it addresses the commercial corridor of Route 11- people complain now about the traffic in Cicero and have been since Wal-Mart, then more residential homes and apartments were built, yet the roads remained unchanged. Cart before the horse I'd say. Let's look at how Wal-Mart's 204,000 Sq ft effected this area. Now you are proposing a 4 million sq ft of building. An article from a Mar 19, 2008 report, Upstate New York will soon be home to the nation's largest Wal-Mart store — a 260,000-square-foot, two-story "supercenter". For this Mega-Development with 50 acres of parking lot, that is a lot of cars. \_\_\_\_\_ How many cars, trucks, vehicles in general did you account for in your assumption?

\_\_\_\_\_ The East side of Route # 11 and Route # 31 has thousands of homes all will be adversely effected by a development of this size.

\_\_\_\_\_ 481 is an offramp so how would you be moving traffic elsewhere?

\_\_\_\_\_ Offramp of 481 onto Caughdenoy, how many homes and properties will be lost there due to widening of the road? Are these people being notified they are in jeopardy of losing property and or their homes?

\_\_\_\_\_ Storm Water - A green light for whatever happens to this project (no project yet, according to you-therefore, this doesn't make sense)

\_\_\_\_\_ What about the effects on drinking water?

Article <https://www.epa.gov/npdes/npdes-stormwater-program>

#### *Problems with Stormwater Pollution*

*Stormwater runoff is generated from rain and snowmelt events that flow over land or impervious surfaces, such as paved streets, parking lots, and building rooftops, and does not soak into the ground. The runoff picks up pollutants like trash, chemicals, oils, and dirt/sediment that can harm our rivers, streams, lakes, and coastal waters. To protect these resources, communities, construction companies, industries, and others, use stormwater controls, known as best management practices (BMPs). These BMPs filter out pollutants and/or prevent pollution by controlling it at its source.*

*The NPDES stormwater program regulates some stormwater discharges from three potential sources: municipal separate storm sewer systems (MS4s), construction activities, and industrial activities. Operators of these sources might be required to obtain an NPDES permit before they can discharge stormwater. This permitting mechanism is designed to prevent stormwater runoff from washing harmful pollutants into local surface waters.*

*Population growth and the development of urban/urbanized areas are major contributors to the amount of pollutants in the runoff as well as the volume and rate of runoff from impervious surfaces. Together, they can cause changes in hydrology and water quality that result in habitat modification and loss, increased flooding, decreased aquatic biological diversity, and increased sedimentation and erosion. The benefits of effective stormwater runoff management can include:*

*protection of wetlands and aquatic ecosystems,*

*improved quality of receiving waterbodies,*

*conservation of water resources,*

*protection of public health, and*

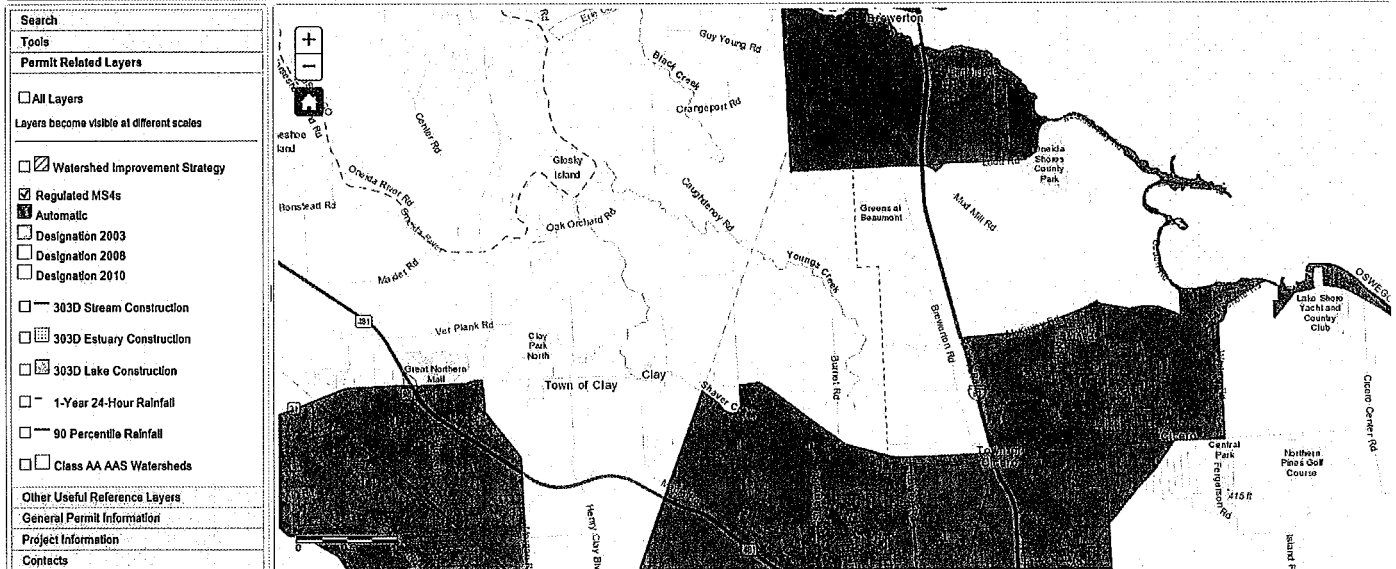
*flood control.*

*Traditional stormwater management approaches that rely on peak flow storage have generally not targeted pollutant reduction and can exacerbate problems associated with changes in hydrology and hydraulics.*

\_\_\_\_\_

## Stormwater Interactive Map

Base Map:



Off-site stormwater discharge locations will be extremely important, as they drain into Youngs Creek, Oneida River and Oneida Lake, as well as, into the wetlands on the property.

"With the expansion of the Project area, the number and size of potentially impacted wetlands and natural water bodies has increased. The expanded site encompasses 17 National Wetland Inventory (NWI) mapped wetlands and two state-regulated wetlands. Classified waterbodies present onsite are tributaries to Oneida River. These surface waters are Class C, and are not considered protected; however, any disturbance would require prior approval from the United States Army Corps of Engineers (USACE) and/or the New York State Department of Environmental Conservation (NYSDEC)."

I want all the documents in regards to this.

The Alternatives section appears rushed.

REQUIRED ALTERNATIVES - \_\_\_\_\_ What do you predict for the future? You are doing all these projections and assumptions to accomodate the now, I want to know all the negative after effects !! All those assumptions and there will be many.

\_\_\_\_\_ I want a detailed report of the Future once taxbreaks run out and this tenant pulls out !

\_\_\_\_\_ I want to know if they stay, would the County/State give more tax breaks or how would you now

'LURE' them to stay in the space!

\_\_\_\_\_ You need to guarantee that this big corporation won't be another Foxconn : from GOOGLE  
*Inside Foxconn's empty buildings, empty factories, and empty ...[www.theverge.com](http://www.theverge.com) ›  
foxconn-empty-factories-wisconsin*

*Oct 19, 2020 — Three years later, the factory — and the jobs — don't exist, and they ... Foxconn failed at that objective, too: last week, Wisconsin rejected the.... That illusion has had real costs. State and local governments spent at least \$400 million, largely on land and infrastructure Foxconn will likely never need. Residents were pushed from their homes under threat of eminent domain and dozens of houses bulldozed to clear property Foxconn doesn't know what to do with. And a recurring cycle of new recruits joined the project, eager to help it succeed, only to become trapped in a mirage.*

\_\_\_\_\_ You need to guarantee this big corporation won't be another Pfizer: from GOOGLE

*Pfizer Got \$160M in Tax Money to Build in Connecticut - CBS ...[www.cbsnews.com](http://www.cbsnews.com) › MoneyWatch › Markets*

*Nov 23, 2009 — Want Pfizer (PFE) to build a new plant in your town? ... through tax breaks, direct grants and infrastructure improvements, to bring Pfizer ... last week that it would pull out in 2011, just when the last of its tax abatements are due to expire.*

\_\_\_\_\_ You need to guarantee this big corporation won't be another Pfizer: another from GOOGLE  
*Were \$60 Million Of Incentives For Pfizer Worth It? - Hartford ...[www.courant.com](http://www.courant.com) › business ›  
hc-xpm-2011-02-06-hc...*

*Feb 6, 2011 — Last week, Pfizer said it would lay off 1,100 people in Groton over the next 18 ... The deep job cuts come less than a year after Pfizer said it would close its ... The New London facility brought a huge jump in Pfizer's Connecticut payroll, ... Also, Pfizer qualified for corporate tax credits, but state officials were ...*

\_\_\_\_\_ I want to know how you would clean up their mess! Detailed report.

\_\_\_\_\_ I want to know how much taxpayer dollars, 20 to 35 years out and after, it will take to clean up the toxic mess and Oneida Lake. Detailed Report.

\_\_\_\_\_ I want to know how you will replace wildlife and endangered species you have wiped out. Detailed Report.

\_\_\_\_\_ 5 million gallons of water a day - what about the Contaminated wastewater, how is that being addressed? Detailed Report.

\_\_\_\_\_ How can a building of that size NOT be an aesthetic visual pollution? The Amazon in Clay is horrible and it is my understanding the traffic issues and impacts will be gearing up when that facility is up and running to capacity. Your assumptions on the traffic issues over there may get people noticing that the assumptions of that build were falsely and inaccurately reported, we will see.

\_\_\_\_\_ How are there sensitive receptors reviews if they are ignored? What did you study?

You are creating disgruntled citizens that are not in favor of this. They watch your wasteful spending



and casual dismiss and disrespect of taxpaying residents. There is no faith in OCIDA doing the 'right thing'. It started out bad. "Whenever the people are well informed, they can be trusted with their own government; that whenever things get so far wrong as to attract their notice, they may be relied on to set them to rights."--Thomas Jefferson to Richard Price, January 8, 1789

There has been no transparency. People are noticing!

\_\_\_\_\_ Will the Park run through the power lines?

\_\_\_\_\_ Zoning - Burnet Road is zoned Res/Agricultural. Zoning was created and put in place to protect residents. How can you propose all this without proper zoning already in place? This sounds illegal.

Where did zoning come from? google:

The earliest zoning laws originated with the Los Angeles zoning ordinances of 1908 and the New York City Zoning resolution of 1916. Starting in the early 1920s, the United States Commerce Department drafted model zoning and planning ordinances in the 1920s to facilitate states in drafting enabling laws. Local zoning and land-use regulations have increased substantially over the decades.

\_\_\_\_\_ How can you possibly give air pollution permit criteria when you do not know the potential business/tenant coming here? \_\_\_\_\_ What are you basing this on?

Tell me again the assumption on this. \_\_\_\_\_ Add more ACRES to study and more Wetlands with increased size and impervious surfaces with no positive effect? I do not have to be a rocket scientist to know that can't be true, on low elevations as much of the park has wetlands 133 acres, it is my feeling more deception regarding this as a negative impact. Doesn't make sense. \_\_\_\_\_ Detailed Report to help me understand.

White Pine Commerce Park is being advertised as containing 1200+ acres. The draft EIS states that 732 acres are prime developable land. This prime developable land is largely surrounded by wetlands. The 2021 draft EIS says "With the expansion of the Project area, the number and size of potentially impacted wetlands and natural water bodies has increased. The expanded site encompasses 17 National Wetland Inventory (NWI) mapped wetlands and two state-regulated wetlands."

A White Pine ad based on 339 acres according to the ad from 2014 that says "Approximately 14.68 acres of NWI wetlands (federal and/or state) are mapped in the Park. These wetlands have not been field verified.

\_\_\_\_\_ Dust and Dirt, Noise ( traffic noise, noise from plowing and back up beepers and noise from buildings, noise from employees ), Air Quality, Traffic exhaust \_\_\_\_\_ How are you protecting the other residents who live close by? A few shall suffer for the many? Meltzer Park is right here. There are kids playing. Dust contaminants and traffic exhaust effects to small children and the elderly. (It is not in your backyard) \_\_\_\_\_ Detailed Report on Dust Contaminant effects of children and the elderly in close proximity to the Park. As well as, those actually at the park. Figure in assumptions of how many people will be at the park and how many are elderly and how many small children on the playground

will be effected and what effects it will have on their lungs. \_\_\_\_ I want that report. You should have that report, as you stated it was an exhaustive report that was done.

Cicero has a facility and ice rink that is in close proximity to this Massive facility as well which was previously noted as postitive.

*Jeff Davis stated we are declaring by issuing a positive declaration that we are saying there is a potential for significant environmental impact for future development for this area and we are going to study it.*

*What is the receiving water for the wastewater discharge? **Oneida River***

*Are there any facilities serving children, the elderly, people with disabilities (e.g., schools, hospitals, licensed day care centers, or group homes) within 1500 feet of the project site? **Yes***

\_\_\_\_ 5 million gallons of water a day. Article below is a concern. \_\_\_\_ Tell me how our water supply will absolutely not **ever** be in jeopardy.

\_\_\_\_ What measures are you taking to guarantee there will not be a water shortage.

Article :

Semiconductor plants need so much water, that it comes to making priorities - who will get water in a drought?

<https://www.nytimes.com/2021/04/08/technology/taiwan-drought-tsmc-semiconductors.html>

<https://www.nytimes.com/2021/04/08/business/taiwan-is-facing-a-drought-and-it-has-prioritized-its-computer-chip-business-over-farmers.html>

Summary of the above from tomshardware.com (a computer hardware forum)

<https://www.tomshardware.com/news/taiwan-droughts-cause-tension-farmers-chip-makers>

*A new irrigation policy that favors Taiwan's chipmakers over its rice farmers has led to increased tension between the two, The New York Times reported Thursday, as the country attempts to respond to a water shortage caused by an ongoing drought.*

*Liberty Times Net reported that Taiwan's Water Resources Agency shut off irrigation to more than 183,000 acres of farmland to conserve water. Yet companies in the Hsinchu Science Park—most notably TSMC—still receive the precious liquid.*

*It might seem odd to prioritize chip production over farming, but Water Resources Agency deputy director Wang Yi-Feng told the NYT that the inverse would be a "lose-lose" because the farmers would suffer from low yields even with irrigated water.*

*Yet a recent study co-authored by the Semiconductor Industry Alliance estimated that 92% of the world's sub-10nm chip production happens in Taiwan. That means problems in the country "may cause severe interruptions in the supply of chips."*

\_\_\_\_\_ Why wasn't Town of Clay lead agency? It is my understanding that the Town of Clay has Final Approval. I felt from the beginning it wasn't right to have the Non-Government Agency conducting this when they are the ones wanting to push it through and displace homeowners and destroy acres and acres of land.

\_\_\_\_\_ CLIMATE issues - 2020 Site Selection below -It looks as though our climate may protect us from a semiconductor facility and a past report from 1996, 'the business climate of New York is not yet becoming competitive with other states'. Both of these support that the climate has not been conducive and is not attractive to a buyer. Our climate is on the side of The Clay Community and Burnet Road! New York # 23.

<https://siterelection.com/issues/2020/nov/2020-business-climate-rankings-cover.cfm>

## Site Selection's 2020 Top State Business Climate Rankings

Overall Ranking	State	Executive Survey Rank	Competitiveness Rank	2019 Conway Projects Rank	2019 Conway Projects Rank Per Capita	2020 YTD Conway Projects Rank	2020 YTD Conway Projects Rank Per Capita	Mature Firm Tax Index Rank	New Firm Tax Index Rank	Final Total Points
T1	North Carolina	2	5	8	12	6	10	34	3	97
T1	Georgia	4	4	4	9	2	2	28	6	97
3	Ohio	3	8	2	1	4	4	9	42	94
T4	Texas	1	3	1	7	1	5	38	47	92
T4	South Carolina	2	11	20	12	10	6	30	4	92
6	Virginia	8	1	7	11	7	9	32	14	90
T7	Alabama	11	9	9	3	13	12	15	23	85
T7	Arizona	10	13	16	15	9	11	8	22	85
9	Kentucky	13	6	3	2	12	7	33	17	84
10	Tennessee	5	6	14	14	17	15	31	24	83
11	Missouri	14	15	19	17	19	21	7	5	78
12	Indiana	25	2	5	8	8	8	2	11	77
13	Louisiana	14	13	15	10	3	1	33	27	76
14	Mississippi	12	22	24	16	24	16	37	10	74
15	Florida	14	13	17	20	11	22	13	9	73
16	Michigan	18	10	10	18	13	20	24	18	72
17	Nebraska	14	12	21	3	30	14	41	21	71
18	Utah	8	28	32	33	34	31	5	12	70
19	California	7	31	11	43	14	42	16	23	69
20	New Mexico	18	32	36	28	29	13	1	20	66
21	Oklahoma	23	21	27	29	32	33	19	8	60
22	Nevada	20	17	32	30	37	36	10	25	55
23	New York	23	36	13	36	15	35	43	13	34
24	South Dakota	25	24	43	37	49	49	22	1	43
T25	West Virginia	25	41	40	40	39	37	17	15	41
T25	Illinois		19	3	4	3	3	40	36	41

I have notes of Chairman, Mr. Hogan with introductions and praises to the Agency and Jeff Davis. Mr. Hogan stated and not quoted word for word, due to poor quality of the recorded zoom meeting, "I think everybody's ah, impressed with how exhausted and comprehensive this whole big process has

been and I have to congratulate you and everything about this process including (?can't hear? 'our') development team here"

When I heard congratulations in regards to, 'Everything about the process', except you are forgetting the Fear & Anxiety, Pain and Suffering it has caused those of the residents that want to stay on Burnet Road, in homes they worked for all their lives. The American Dream of owning my home and fixing it up and making it MY HOME, there's no place like home, dutifully paying my taxes all these years. The onslaught of this, with the Lack of Tranparency and being blindsided and harassed with the threat of eminent domain.

Congratulations? Really? You have no idea what we have gone through and are going through.

You want us to bend over and take it, you don't care one bit about Burnet Road residents and our lifelong homes or the entire Clay Community.

Someone said this to me, 'They are trying to take properties to create another larger property, that is not even sold yet. I have never heard of this process being used to displace property owners for a project that does not yet exist. Usually there is a highway or shopping center already planned and approved by the municipalities involved. Eminent domain is usually the last thing that needs to be done to finish the process. This is way different. They just want to create a more attractive parcel to offer potential buyers. That is an abuse of the process the way I see it. Purchase Options are their way of showing potential buyers that a larger and more saleable parcel can happen.'

New York State is one of the last 7 states to address EMINENT DOMAIN REFORMS. This IS an abuse of eminent domain.

Bill of Rights- sets rules for due process of law and reserves all powers not delegated to the Federal Government to the people or the States. And it specifies that "the enumeration in the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people."

The Ninth Amendment states that listing specific rights in the Constitution does not mean that people do not have other rights that have not been spelled out.

I HAVE A RIGHT TO PROTECT MY HOME. I have the right and the duty to speak up.

Unavoidable Adverse Impacts in taking people's homes. OCIDA why don't you have the buyers buy out these people for the figure ( \$\$ ) the displaced homeowner feels they need, as well as, for the anxiety and pain and suffering. Take it out of their tax breaks when you know, a business signed with you. It's a misuse of eminent domain for OCIDA to threaten eminent domain when there is no signed business to move into White Pine!

When, and IF, THERE IS AN ACTUAL BUYER ! 100 PERCENT SIGNED and COMING HERE, including not just Burnet Road - but others who don't yet know they will also be displaced when this comes, let these giant corporations with their beyond wealthy CEO's, buy out all these people effected, if they don't want to sell.

Public meeting May 24th at 6:00 p.m., I was happy to hear Town Of Clay Board Members Mr. Kevin Meaker and Mr. Ryan Pleskach, oppose Eminent Domain. Legislator Cody Kelly also brought up valid points. Many valid points 'against' were brought up in the meeting.

As far as the CEO's and Businesses on the call my response to them would be fine - just put this monster

of a hazard somewhere else. There are other Alternatives.

There will be a significant adverse effect on the environment regardless of what your review says. You are destroying a natural landscape, wildlife and wetlands with your assumptions.

Concerned Burnet Road Resident - Maureen Matthews

cc: Neil Gingold

cc: mnuzzo

**May 26, 2021**

**Petition Numbers**

**My attorney advised to go ahead and let you know our petition numbers thus far.**

**From the site:**

**05/26/2021 6:12 p.m.**

**Say "NO" to a massive INDUSTRIAL FACILITY in Clay, NY**

**1,253 Plus over 85 hard copy signatures.**

**Supporters**

**Say "NO" to a massive INDUSTRIAL FACILITY in Clay, NY**

**1,253 have signed. Let's get to 1,500!**

**Names would presented if necessary.**

June 1, 2021

To Whom it May Concern,

I am writing this letter to state I oppose the building of any industry on Burnet Road.

To begin has anyone taken the time to truly see what type of wildlife is on this road and surrounding areas? On any given day you can see turkeys roaming with their young, deer grazing in the fields, a variety of birds flying and nesting in the both the trees and field, and during mid summer months you can find turtles nesting in the swamps. Were you aware that Burnet Road is home to wetlands? So **yes** there is a huge ENVIRONMENTAL IMPACT this industry will have on wildlife.

Secondly, the air, noise and water pollution that will be caused by this industrial plant is something people should not have to live with. The polluted water will be draining into the swamps and Oneida River which in turn affects human, plant, and animal life.

Thirdly, the traffic will be out of control. Roads will need to be widened and more traffic lights installed. Who will be paying for this? The tax payer I am assuming. Widening the roads and 50 acres of paved parking lot has a huge ENVIRONMENTAL IMPACT.

Lastly, I am wondering why one would need to destroy the rural beauty that surrounds Burnet Road and its RESIDENTS for your industrial plant when there is Destiny Mall , Great Northern Mall, and many other abandoned spaces for you to go too. Reuse what is already available!!

Please do a thorough ENVIRONMENTAL IMPACT STUDY. A industry of this magnitude will forever change the life of the Town of Clay and the residents of Burnet Road.

Thank you

Jill O'Brien

*Jill O'Brien*  
*Town of Clay and Burnet Road*  
*Resident*



7854 Oswego Road • Liverpool, NY 13090 • (315) 622-5150 • Fax (315) 622-5155 • [www.eldanhomes.com](http://www.eldanhomes.com)

June 2, 2021

**Via Email:** [economicdevelopment@ongov.net](mailto:economicdevelopment@ongov.net)

Onondaga County Industrial Development Agency  
Robert Petrovich, Executive Director  
333 West Washington Street, Suite 130  
Syracuse, New York 13202

**Re: Manufacturing Plant in the  
White Pines Industrial Park**

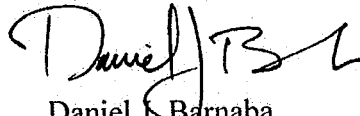
Dear Sir:

My name is Dan Barnaba and I am the owner of Eldan Homes, Inc., a residential homebuilding and land development company based in Liverpool, NY. My company has been building homes in Onondaga County for over 45 years. I can say that during this time, there has been very little optimism relating to job creation in our market. New home sales have steadily declined each year as jobs have left our region. The prospect of any job creating enterprise is great news and breeds excitement and enthusiasm in our industry.

The White Pines Industrial Park (the Park) has been in place for future land development for well over a decade. Any opposition to businesses locating to that area should have been voiced long ago. I respect the neighbors concern for change, but I trust that any development would be tastefully done and would be nothing but an asset to our community. So, I am voicing my support for any industrial development in the Park, particularly the type of development that would create new jobs.

If you need any further testimony from my industry on this matter, please let me know.

Sincerely,

  
Daniel J. Barnaba  
President

Cc: Mary Thompson, HBR of CNY



**Written comments in response to White Pines EIS**

Renee Matthews &lt;matthera22@yahoo.com&gt;

Wed 6/2/2021 10:12 AM

To: ED - Web 1 &lt;economicdevelopment@ongov.net&gt;

**NOTICE:** This email originated from outside of Onondaga County's email system. **Use caution** with links and attachments.

My name is Renee Cordell and I live in Clay, NY. I have lived here most of my life and like it here. I never dreamed of leaving until recently. I'm currently raising 4 young children. I am completely against, specifically, a semi conductor facility going into White Pines Commerce Park.

As noted in the Environmental Impact Statement, there are several alternative options for the park. The reasoning for not going forward with any of the alternatives is simply because OCIDA WANTS to get a semi conductor facility in the park. They do not WANT anything else. They are satisfied with taking peoples homes with eminent domain to achieve this goal. They can get another smaller company in the space that wouldn't result in people losing their life long homes. They just aren't satisfied with that option. To me, they don't deserve to take people's homes just because they WANT a larger company. The community doesn't want a semi conductor plant that uses hazardous chemicals near us.

Which brings me to the next issue is the air pollution. It is noted in the EIS that there are varies hazardous materials that are used in creating chips. There is a large concern for the amount of chemicals that will be emitted into the air. The EIS states that the company that goes in will be subject to air emission permitting by the NYSDEC. That isn't good enough. There are too many residential homes, playgrounds, schools, etc in the area to allow any amount of hazardous fumes into the air. It is fact that many of the chemicals used to produce chips are hazardous to humans. We don't want a plant using these materials and putting its waste into the environment near where I live! There have been issue in the past with leaks. For example in 1992, a San Jose neighborhood had to be evacuated after smoke was coming from a local chip plant.

It is admitted in the EIS that there will be significant dust put into the air during construction as well.

Water contamination is another issue I worry about. Many swim and fish in the waters where the proposed plant will drain its waste. I understand the water will go through a cleaning process. Will this process be sufficient? There was a case in 1982 where California had to a drinking well near a semi conductor plant because it was discovered that residents had been drinking water that was contaminated. I don't want the risk that a semi conductor plant brings, near my home.

Traffic is already an issue locally. In neighboring Cicero, NY traffic is terrible during rush hour. If a manufacturing facility goes in White Pines the increase in traffic will be terrible. Children who have to ride the bus to schools in Cicero will be sitting on the buses for extended periods of time just to get to school and back. The roads near White Pines will most certainly need to be widened. Who else will lose property or their homes to widen the roads?

Too many promises have been in central NY. Our mall was supposed to be the biggest and best in the country, now its near foreclosure. Many big companies leave our area because after tax breaks end, operating in NY doesn't make sense. Then the community is forced to look at ugly huge abandoned buildings. We don't want your promises and we don't want your semi conductor plant.

The biggest argument for this excessively large development in White Pines is job growth and high paying jobs. I find this interesting because there have been lawsuits that claim that workers in semi conductor facilities are more prone to develop cancer and have a higher rate of miscarriage.

Furthermore, when I was on the public meeting for this EIS I noticed all in favor of the project only mentioned the job and economic effects. No one mentioned or discussed the environmental or health issue at stake, which was the main reason for the meeting. It proves to me that this project is all about money. As usual the people in charge only care about money. They are not concerned with peoples health or the well being of the overall community and locals. The locals will most definitely be adversely affected by this proposed project. New people may be brought to the area but the existing locals will suffer. More traffic, bad air quality, and strained school systems.

The negative impacts of a manufacturing plant in White Pines outweigh the possible benefits. Put it somewhere else because we do not want it here potentially poisoning our local residence.

**Written comments in response to White Pines EIS**

Renee Matthews &lt;matthera22@yahoo.com&gt;

Wed 6/2/2021 10:12 AM

To: ED - Web 1 &lt;economicdevelopment@ongov.net&gt;

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The negative impacts of a manufacturing plant in White Pines outweigh the possible benefits. Put it somewhere else because we do not want it here potentially poisoning our local residence.

June 2, 2021

Onondaga County Industrial Development Agency  
Robert Petrovich  
333 West Washington Street  
Suite 130  
Syracuse, NY 13202

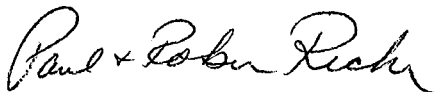
Please let it be noted that we are opposed to the development of a micro chip plant to be built in the Town of Clay, at White Pines Park.

Although we are not opposed to progress, The Town of Clay is already at its maximum capacity. The traffic issues will be worse than they already are. The last bit of undeveloped land would be gone forever. Our CNS schools will be overcrowded. Where will all these new employees live? The Town of Clay is running out of places to build new homes, as many new homes have been built in the past 20 years or so.

We are residents on Burnet Road and are hoping that if a business does wish to build at this location, that they will not need the entire acreage that is being promoted. The Wildlife would be displaced. Endangered and threaten species would be losing their habitat for their survival. There are Federally protected Wet lands located on the proposed site. Youngs Creek located at the end of Burnet Road feeds into the Oneida River which flows in to Oneida Lake.

This is where we planned on retiring. If we wanted to live in a housing track we would have bought a home in the many housing tracks located in the Town of Clay. Instead, we kept to our roots and stayed on Burnet Road, the road that we both grew up on. Both our Grandparents and Parents settled on Burnet Road and many of our relatives did as well and are still living on the road. This is our neighborhood. Just like any other neighborhood in the Town of Clay, either on Henry Clay Blvd, or Cherry Estates, Lawton Valley Hunt, etc.

Please put yourself in our position, just for a moment. Look around your neighborhood. Look at what would be lost if this was happening in your back or front yard. Progress is a good thing, but not at this location in the Town of Clay. Please preserve this last piece of green space in the Town of Clay.



Paul & Robin Richer  
8722 Burnet Road  
Clay, NY 13041

**White Pine Commerce Park Development Site**

Emily Voegler &lt;e.voegler@gmail.com&gt;

Fri 6/4/2021 1:35 PM

To: ED - Web 1 &lt;economicdevelopment@ongov.net&gt;

**NOTICE:** This email originated from outside of Onondaga County's email system. **Use caution** with links and attachments.

Good afternoon OCIDA and Executive Director Robert Petrovich,

I am writing to strongly oppose any construction of additional industrial sites in our area. It is an absolute travesty that we would even consider further destruction of our land and what is left of semi-wild spaces. At this point we should have already learned from the ongoing cycle of building these monstrosities, just for them to lie empty. How many large developments are currently empty in our area? It is a matter of time before Destiny USA is empty, too. This is a mistake for our future. Let us not be bought by executives and instead make a better decision. Do not add to the destruction of our area through this potentially huge mistake.

Sincerely,  
Emily Voegler

## Clay development

vi <mygirlgumpy@aol.com>

Sat 6/5/2021 8:33 PM

To: ED - Web 1 <economicdevelopment@ongov.net>

**NOTICE:** This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

Dear Mr Petrovich,

I'm writing you in an effort to stop the development of the White Pine Commerce Park.

My husband and I owned a home in Cicero for over 20 years but had to give it up 4 years ago because of his mobility issues. It was the hardest decision we've ever had to make. We now rent an apartment at Tocco Villaggio in Cicero.

I can see Burnet Road out of my bedroom window. I do not want my husband to have to deal with pollution, traffic and noise. We can look out in the fields and watch deer, turkeys, geese, herons and even an occasional coyote. Our peaceful "Golden Years" will be taken away from us.

My heart goes out to the residents of Burnet Rd and what they're being put through.

This complex does not belong in a residential area!

Regards,

Ed and Amy Panek  
5501 Legionnaire Dr. Apt 203  
Cicero, NY 13039

## White Pine proposal Clay NY

johanne wilde <wildeauntie@msn.com>

Sat 6/5/2021 4:36 PM

To: ED - Web 1 <economicdevelopment@ongov.net>

**NOTICE:** This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

Much of my life was spent in Springfield Massachusetts. I worked for the USPS across the road from Monsanto. Starting off working the night shift when we would leave for home in the morning our cars had a black film on them. When the air handlers were turned on these toxins were entering the building. 30 years later many of my coworkers have passed away at young ages from cancer, suspected by being exposed to the toxins and chemicals, liked to the proposed plant. I moved to this area several years ago to be close to my son and his family, to watch my grandchildren grow and thrive in this beautiful suburban area that they love. They have invested their time and money to have a great place to raise their family with the idea this was their forever home. Now you want to take it away.

I am STRONGLY opposed to a mega industrial manufacturing facility in the Town of Clay. There are so many aspects of this proposed project that are wrong that it is not possible to address them all in one letter. I reside just a mile down the road on route 31 in Cicero NY. Traffic over the last 4 years make difficult to travel at many times of the day. I am 69 years old and retired. Morning walks are enjoyed while encountering deer, turkey, and the beautiful birds along with the quiet of the area, even see an eagle or two gliding around outside my door. This new plant will produce 20 - 30 tons of solid waste a day, this is a big concern to me as to the additional trucks to remove the waste. This plant will emit pollutants into the air and ground not to mention the noise. If built, the traffic will be a total logjam as the roads coming through Cicero on route 31 are currently inadequate. Oneida Lake will be in jeopardy and will be another Onondaga Lake full of pollution losing the fishing and recreation area that cannot be replaced. Environmental impacts to wetlands, endangered species, and water and air pollution will occur, that cannot be replaced, once gone they are gone forever. This proposed plant will produce toxins, chemicals, destruction to water and land, and air quality for miles around. President Biden on January 27th issued an executive order to protect 30 percent of the nation's lands, freshwater, and ocean areas by 2030 is a game-changer, yet I have read the Federal Government will be offering money to states creating these disastrous Chip manufacturers. I understand the Federal Government, and State Government want this, but our local government can stop it from being in my backyard. This needs to be built in the deserted concrete areas that have the existing infrastructure to replace the decay instead of taking unblemished natural beauty.

Thanking you in advance.

Johanne Wilde  
5501 Legionnaire Drive  
Cicero, NY 13039

**From Cicero Resident, Christina A. Burton, property owner at 6299 Wooderton Path,  
Cicero, NY 13039**

Christina Burton <[cburton730@icloud.com](mailto:cburton730@icloud.com)>

Sun 6/6/2021 7:55 PM

To: ED - Web 1 <[economicdevelopment@ongov.net](mailto:economicdevelopment@ongov.net)>

NOTICE: This email originated from outside of Onondaga County's email system. Use caution with links and attachments.

Sent from my iPhone

*(Nothing but subject line included)*

**white pines**

Sara Anderson <earthmother59@gmail.com>

Mon 6/7/2021 1:19 PM

To: ED - Web 1 <economicdevelopment@ongov.net>

**NOTICE:** This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

In this day and age how could you even consider what you have planned for northern Onondaga county?! The effect on the environment will be disastrous. The watershed flows into the river and then downstream to Lake Ontario and eventually to the Atlantic. No one needs a Silicon Valley level of pollution in our wetlands. Think of our grandchildren and great grandchildren. They are the ones that will be living with your short -sidedness.

We complain about the destruction of the amazon when we are no better. God gave us this gift and we are entitled hypocrites who destroy everything we touch.

I voted for the people who are backing this. I thought better of them. Silly me - never again. Remember the saying - fool me once, shame on you. Fool me twice, shame on me.

Sara Anderson

Brewerton

Mother of two SUNY ESF grads

Grandmother of a future botanist



## Development in Clay

Sheila Downey <SMDOWNEY1@hotmail.com>

Mon 6/7/2021 1:57 PM

To: ED - Web 1 <economicdevelopment@ongov.net>

**NOTICE:** This email originated from outside of Onondaga County's email system. **Use caution** with links and attachments.

Dear Mr. Petrovich,

I'm writing to let you know that I am totally opposed to this huge semi-conductor development proposed for Rt 31 in Clay that has come to my attention. What happens to all the wildlife, including endangered species, in that area? Where is all of that supposed to go? Where is all of the rainwater that area absorbs supposed to go? There are already massive drainage issues in the area! What about all of the additional pollution those that live in this area would have to contend with? Higher cancer rates, infertility and birth defects...would you want to live next door to that?!!

There are several reasons why this should not be built in our rural area. We do not want it here!! If you are successful in pushing this, I plan to move from the area.

I appreciate your time and implore you to reconsider this location for the benefit of all who live around here.

Sincerely,

Sheila Downey

## White Pines- Industrial Park

Kim Graziano <ksgraziano@gmail.com>

Mon 6/7/2021 1:04 PM

To: ED - Web 1 <economicdevelopment@ongov.net>

NOTICE: This email originated from outside of Onondaga County's email system. Use caution with links and attachments.

I am writing to let you know that I am strongly opposed to a massive industrial park to be built where the White Pines land is. I think it is disgusting that this could even be a possibility. It is especially disgusting what you are doing to the poor people on Burnet Rd. They are being threatened with eminent domain and fear they will lose their homes and have no place to go in comparison to what they have now. They are living in limbo right now and it is wrong. Advertising their land as if you already own it is wrong too.

I live off of Caughdenoy Rd. and I fear the massive pollution that would happen if that monstrosity is built. The air will be polluted, the water will be polluted (Oneida Lake and other surrounding waterways), the traffic will be horrendous. You want to put this massive thing in where there are communities of homes surrounding it. It does not make sense to me why you need to destroy people's homes and the wildlife that live there to build this thing that could be built on other vacant concrete properties in the county. This thing will probably be empty five years after it is built! My home value will decrease while my taxes will probably go up because of this thing. It isn't right.

Tell me this, is there a definite tenant for this monstrosity? I fear that you want to push through intensive, unneeded, destructive "development" and keep everyone fighting over a highly unlikely and unpopular development concept that is actually complete B.S.! Big Plans and to draw a big tech or whatever manufacturer are almost always empty threats/promises, and the real threat to an adjacent or surrounded community is usually environmental destruction and/or an active plan to deliberately flood or otherwise devalue homes, and/or for the land owner to get free infrastructure from the taxpayers including roads and utilities and/or lock up once public land.

I am not alone in my opposition to this project. My opposition will also show at the polls.

Sent from my iPhone

**Re: Proposed White Pines Industrial Park | Attn: Robert Petrovich**

Kirk Rothrum &lt;kirk@rothrum.com&gt;

Mon 6/7/2021 12:25 PM

To: ED - Web 1 &lt;economicdevelopment@ongov.net&gt;

**NOTICE:** This email originated from outside of Onondaga County's email system. **Use caution** with links and attachments.

I'm writing regarding the proposed development of the so-called "White Pines" industrial park in Clay, NY.

I find it disgusting that our local government secretly marketed their constituent's properties for sale to private developers.

To call this a gross breach of trust, would be an understatement.

The goal of bulldozing more than 30 family homes, including a community church, and paving over thousands of acres of wildlife and wetlands for a private developer to build a sprawling factory, sounds like something from America's dark, polluting past.

The attempt at bullying hard-working American families into selling their homes on-the-cheap, with threats of 'Eminent Domain' wrong and unjust.

The proposed factory is neither for the public's use, nor the community's benefit. It will benefit a private business, and probably a few politicians along the way.

The right to own property is a bedrock American freedom, and Clay and Cicero residents will NOT stand by while local politicians use a Soviet-style iron fist to steal their property. Burnet Rd. and it's surrounding nature are just the beginning. Once a residential area is zoned for a factory, hundreds of nearby families, from Caughdenoy Rd. to Route 11, will see plummeting property values. A Google Maps Satellite View shows where the next encroachments will likely take place once Clay becomes an industrial area. Meltzer Park? Both sides of Caughdenoy Rd?

Meanwhile, a drive around Syracuse and CNY shows one defunct property after another. From the multiple empty factories on Thompson Rd., to the multiple dead malls, whose demise was unquestionably sped-along by local government's inept interference.

Anyone who's curious about Onondaga County government's track-record with attempted "economic development", needs to look no further than the embarrassing "Film Hub" in East Syracuse. A project that gifted taxpayers out of tens of millions of dollars to build a monstrous facility that now sits largely dormant, loses far more money than it's ever made, and was nothing short of an abject failure at attracting business to the area.

Local government (I'm looking at you Ryan McMahon), can better serve it's constituents by doing less, not more. Bulldozing family homes and paving over our natural wildlife habitats in HOPES to build a factory, isn't progress, and it certainly isn't for "public use".

Sincerely,

Kirk Rothrum

Cicero, NY

## Opposition to White Pine Commerce Park in Town of Clay

fourpawdrive@yahoo.com <fourpawdrive@yahoo.com>

Tue 6/8/2021 9:23 PM

To: ED - Web 1 <economicdevelopment@ongov.net>

**NOTICE:** This email originated from outside of Onondaga County's email system. **Use caution** with links and attachments.

Dear Mr Petrovich,

I am writing to express my opposition to the planned White Pine Commerce Park in the town of Clay. As a resident of the town and one-time resident of that area, I feel this is an inappropriate use of this area and tax dollars. Where will the wildlife go when their habitat is destroyed? Residents live there to enjoy the peace of a rural area. They should not be displaced so that this area can be destroyed with ugly buildings, increased noise, traffic, air and water pollution. Will they have to move out of Onondaga County to preserve their quality of life? There are so many empty buildings in Onondaga County in commercial areas. Surely some of them can be remodeled or updated to accommodate these companies. What about the almost empty mall? So much of that area that was once farmland has been paved over to create miles of strip malls. What was once a quiet two lane road is now a multi-lane highway with constant traffic congestion. Don't let this sprawl continue down Route 31.

I hope you listen to your residents. White Pine Commerce Park is a bad idea!

Sincerely,

Susan M Churchill  
North Syracuse

Thanks for taking the time and effort to hold the online OCIDA / White Pines Development meeting on May 24, 2021. It was interesting to hear everybody's comments on the possible changes to the area and I would like to add my written comments as well. I have an active PE license (Georgia) and I am an engineer hired by Pall Water (Danaher Corp) working on various industrial water filtration systems. I do not live in the proposed development area, but I do have personal interests in that area. My comments are as follows:

- 1) There is a growing concern of eminent domain abuse. At this time the threat of eminent domain has my concern. There is a significant number of residents that have been residing in the proposed area that are unwilling or unable to move, or sell their property. There already have been recent events that clearly define eminent domain abuse. Such events include advertising residential owned land as land ready for industrial development by White Pines or the threat of eminent domain to motivate residents to sell their property below market value. Furthermore, White Pines has no client requesting to build on their site. There should be no talk of eminent domain at this time. Any eminent domain will result in litigation.
- 2) The proposed area includes zoning for agriculture and residential usage. Furthermore, some of the proposed area is wetlands. Semiconductor fab plants are very sensitive to seismic shocks. I would expect this to include shifting or sinking mega-buildings. Examples of Cicero High school and Hyundai plant in Montgomery, AL, and others have had their share of difficulties building on similar muddy terrain. This proposed area is not defined as "shovel ready."
- 3) There is no guarantee that a semiconductor plant will be successful by the time it would be commissioned. While there is a semiconductor chip shortage now, this may not be the case in the near future. Furthermore, this area currently lacks infrastructure to support a sudden growth of new employees. Also, there is no guarantee that the required number of technological trained employees in the area will be available. Again, this proposed area is not defined as "shovel ready."
- 4) I'm not convinced that the environmental impact on any industrial site of this magnitude has been thoroughly analyzed. Please keep in mind of the neighboring residential areas, wetlands, noise, and pollution that will be contributed. Also, I'm skeptical of cleanup responsibilities.
- 5) I haven't heard of any alternative sites or plans. I'm aware of the number of dead industrial sites within and around Onondaga county. It seems that this should be considered as there would be no eminent domain or negative impact environmental issues. Perhaps there are some government sponsorship programs in getting some of the dead industry sites back to life.
- 6) There are strong sentimental values tied to the land that is proposed for development. Some of these residents have been in the proposed site for generations. My parents ashes have been buried in the proposed site.

I understand that economic development is a necessity and I'm glad to see successful economic development in CNY, I do not see this proposed site as a possible successful development site. When watching the online meeting from Monday, May 24, 2021, I have the impression that all the comments in favor of the site were over-optimistic and

subject to groupthink. For the reasons mentioned above, I do not see this proposed site as "shovel ready."

Dan Serog

To Whom it may concern,

As a resident of Clay, I was very interested in learning about the proposed project, that could impact my life. The manufacturing facility at White Pine Commerce Park has not been transparent with plans. Personally, I am not impressed with Zoom meetings, have had enough during covid times. Not sure how that was publicized, but would prefer an open meeting with intelligent information given regarding the plans for the project. Already, the Amazon expansion on Mongen Rd. in Liverpool has had an impact and it has not even opened yet. Growth does mean change but I think often a big picture is not apparent. The roads have been impacted with more traffic, congestion, noise and air quality are just a few that we are witnessing. The lack of trees, green areas and loss of wetlands have made a negative difference. Yes, the fiscal impact with jobs will be a wonderful asset to this area. We need good change, I am just asking that we utilize the wonderful resources of scientists, universities, to increase environmental impacts on our world. Short term solutions are not working especially when they result in long term damage. Please give a fair representation of the proposed project. Opportunities will be most welcome, keeping our future generation in mind! Thank you for listening.

Sincerely,

Patricia Powers-Burdick

## Public Comment for GEIS White Pine Commerce Park

James Heins <jmheins@gmail.com>

Wed 6/9/2021 12:54 PM

To: ED - Web 1 <economicdevelopment@ongov.net>

Cc: ckell1251@gmail.com <ckell1251@gmail.com>

NOTICE: This email originated from outside of Onondaga County's email system. Use caution with links and attachments.

To whom it may concern.

I would like to go on public record as being opposed to the proposed development of the White Pine Commerce Park. If I am in favor of any alternative, it is Alternative 1 - no action!

I am appalled at the cavalier attitude by OCIDA as to the possible use of eminent domain to remove homeowners from their property on Burnet Road. The report is written as if this project moving forward is a foregone conclusion and the homeowners do not matter. I have trouble keeping my words civil in response.

I fully understand the impact economic development has on our community, from investment in infrastructure to the creation of jobs. But this project is full of issues, from the lack of community support, to potential devastating impact on our environment and fauna.

Consideration needs to be given to the entire area as well, including our neighborhoods. Prolonged construction vehicle traffic on Caughdenoy Road between the Rt. 481 exit and Rt. 31, which already has design issues leading to multiple accidents and power outages over the years, will create many problems for the homeowners in local developments such as Country Meadow and Coachmans Crossing. Issues with ground water displacement from the construction and potential acres of paved surface at the development would work their way into our neighborhoods. All the best engineering and planning can't prevent it. Eventually water wins. Not to mention the potential for industrial pollution and contamination of our soil.

Lastly I want to address the name of the commerce park that is being marketed as a 'modern' business park even though it is currently open land and private homeowner land. I know OCIDA probably had nothing to do with the naming. The use of 'White Pine' is ironic. The white pine is a symbol of peace and unity to the original peoples of this land. It is also a symbol of liberty, independence and strength used by early American colonials, including George Washington. But here, it symbolizes the tyranny being practiced by our county government on its own people, namely the residents of Burnet Road.

Sincerely,  
James M Heins  
5174 Lyle Drive  
Clay, NY



## Opposed to the Industrial Park in Clay, N.Y.

oahu2010@comcast.net <oahu2010@comcast.net>

Thu 6/10/2021 1:34 PM

To: ED - Web 1 <economicdevelopment@ongov.net>

**NOTICE:** This email originated from outside of Onondaga County's email system. **Use caution** with links and attachments.

I am opposed to this industrial park in Clay, N.Y. A plant of this size will certainly pollute the air, water systems, and have other negative affects on the environment.

A plant of this size will be releasing Ammonia into the air and water. This will harm humans and wildlife. This will be especially dangerous for the elderly living in the area!

The high volume of traffic and widening of roads will also be detrimental to all.

Please reconsider where you plan on putting this industrial park!.

Jill Allen

The following is a comment on OCIDA's 2021 Draft Supplemental Generic EIS regarding the White Pine Commerce Park:

First and foremost,

1. OCIDA **should not** be the lead agency of this project since as they are a the developing agency and have clearly stated in this EIS "OCIDA's substantial investment in the Park to date" is a leading factor in why they are "unable" (unwilling) to look at alternatives (smaller scale or relocating the project elsewhere). Throughout the EIS, there is a blatant bias driven by OCIDA's economic factors that DO NOT have a place in an EIS. This bias is unacceptable – the entire EIS should be rewritten by a third-party agency that is not financially or politically tied to either OCIDA or Onondaga County.
2. One of many problematic issues with this EIS is the continued threatening use of "the Eminent Domain Procedure Law (EDPL)". Eminent Domain should not be used as a tool to intimidate current landowners to sign lowball purchasing agreements. Eminent Domain should not be used as a tool for private development.
3. It is clear through this EIS, this project is lacking a concrete plan and thus there are inadequate "mitigation" efforts addressing the vast environmental impacts a project this size would have on the surrounding air, water, wildlife, and ecosystem services. These resources are irreplaceable! The lack of a plan then leads to a lack of responsibilities when irreversible environmental impacts take place.
4. Wetland/floodplain delineation and rare, threatened, and endangered plants and animals' surveys should be required before any development takes place. The mass alteration from residential/agricultural to industrial will significantly impact all living organisms. Further analysis is required to recalculate run-off, pollution, noise, and traffic impacts.
  - a. What specific monitoring efforts will be administered (and by who?) during (and post) development to ensure that wetlands and floodplains are not impacted, and that mitigation is not required?
  - b. These monitoring results should be made public.
5. What conversations have taken place between Town of Clay Planning Board and OCIDA about rezoning the Agricultural zoned areas to Industrial? Has Town of Clay Planning Board already given an initial approval? As OCIDA states, they have already invested a lot of time, effort, and money into this project- it seems unlikely they would do this all without having somewhat of a reassurance that the rezoning would happen. What happens if the Town of Clay's Planning Board does not give approval to rezone?

During the public hearing held on May 24<sup>th</sup>, 2021 via zoom- the support for the project came from businesses/CEO (invited?) that ONLY spoke of economic growth; not a single person addressed environmental impacts (which was the focus of the meeting).

1. Job creation (4,000) and economic stimulation was the focus of the public hear and was mentioned numerous times in the EIS. Along the lines of tax management and financing options that OCIDA offers- what is OCIDA planning to offer the tenant or tenants in the semiconductor industry? What are OCIDA's estimates for the stimulated local economy vs. the tax abatements they plan to give.

Overall, I strongly oppose this development at this location, use of eminent domain, and rezoning agricultural lands to industrial. Too many times industrial developments take precedence over environmental resources and end with irreversible damages and/or abandonment. The wildlife, soils, plants, and wetlands should be protected.

Sincerely,

C. Drury

6/8/21

I TOO STRONGLY OPPOSE THE MEGA INDUSTRIAL MANUFACTURING AT WHITE PINE COMMERCE PARK. TO TAKE AWAY 1,250 ACRES OF OUR ENVIRONMENT IS NOT HEALTHY TO OUR ENVIRONMENT! WE TAKE AND TAKE FROM MOTHER EARTH AND LOOK WHAT WE ARE DOING TO HER. DO I SUPPORT PROGRESS, ABSOLUTELY BUT NOT AT THE COST OF THIS PROJECT. I HAVE LIVED IN CICERO FOR OVER 25 YRS AND HAVE SEEN IT GROW AND PROSPER AND WITH THIS TRAFFIC HAS GROWN IMMENSELY. DO WE NEED A PROJECT LIKE THIS TO INCREASE TRAFFIC, POLLUTION AND AGAIN TAKE AWAY FROM THE ENVIRONMENT. THERE ARE MANY OTHER AREAS AROUND SYRACUSE THAT COULD ACCOMMODATE THIS, HOWEVER, NOT SURE THIS WOULD BE GOOD FOR THE ENTIRE AREA.

PLEASE RECONSIDER THIS PROPOSAL!!

THANK YOU

*Martha Seeger*

P.S. PLEASE DO NOT PUT IN PAPER W/ MY NAME ON IT

(No subject)

gary brown <garybrown09fxdc@gmail.com>

Thu 6/10/2021 4:50 PM

To: ED - Web 1 <economicdevelopment@ongov.net>

**NOTICE:** This email originated from outside of Onondaga County's email system. **Use caution** with links and attachments.

Mr. Robert Petrovich  
Executive Director

Dear Sir,

As a resident of the Town of Clay, I am totally **OPPOSED** to the subject development off Burnet Road / Route 31.

Is there no other place in Onondaga County that has previously been developed, properly zoned, and can be "recycled" to receive this business?

The eviction of the homeowners on Burnet Road to make way for a "for profit" business is even worse, and totally shameful than the removal of homes for Route 81 through Syracuse. At least Route 81 was for the public good.

Further the destruction of the environment is a sin. Haven't we already destroyed enough?? This project needs to stop **NOW** !

Sincerely,  
Gary Brown  
Liverpool, NY

## Clay factory on Burnet Road

Haley Hutter <hutter@oswego.edu>

Fri 6/11/2021 6:29 AM

To: ED - Web 1 <economicdevelopment@ongov.net>

**NOTICE:** This email originated from outside of Onondaga County's email system. **Use caution** with links and attachments.

As an Onondaga County resident, I would like to state my complete and total opposition to the Clay factory on Burnet Road.

--

Thanks,  
Haley Hutter

Personal:

I have lived here for almost 13 years. It's my first home I bought on my own and it means a lot to me. I was born and raised in Clay so the fact that this is happening to us is very discouraging to me and down right shady. I'd also like to call out the fact that those people you had speak for the public hearing that were for the project don't even reside in the area or live near it. I'd also like to point out the fact that we know those individuals were asked to be on the call to make it look like there were more people that supported it than they really are. The lack of transparency, harassment, the lies... it's quite clear that those of you behind this lack of conscious. I'm pretty sure if any of you even lived in the area you would not want this in your backyard.

You are trying to take away what rural part of Clay we have left and going to destroy what people love about this area. What is happening here is corporations are being prioritized over human beings. Jobs can be created without displacing people from their homes and destroying a community in the process. We should be putting our focus on local businesses and not large scale economic development especially when it poses a threat to people's health. You're talking about taking properties without a clear project in mind.

Environmental and health:

I'd like to point out some of the many concerns I have from the EIS.

Water Resources With the expansion of the Project area, the number and size of potentially impacted wetlands and natural water bodies

has increased. The expanded site encompasses 17 National Wetland Inventory (NWI) mapped wetlands and two state-regulated wetlands. Classified waterbodies present onsite are tributaries to Oneida River. These surface waters are Class C, and are not considered protected; however, any disturbance would require prior approval from the United States Army Corps of Engineers {USA.CE) and/or the New York State Department of Environmental Conservation. What is the receiving water for the wastewater discharge? Oneida Rivers

Are there any facilities serving children, the elderly, people with disabilities (e.g., schools, hospitals, licensed day care centers, or group homes) within 1500 feet of the project site? Yes

Does any portion of the project site contain wetlands or other waterbodies (including streams, rivers, ponds or lakes)? Yes

Does project site contain any species of plant or animal that is listed by the federal government or NYS as endangered or threatened, or does it contain an area identified as habitat for an endangered or threatened species? Yes (sedge wren and Indiana bat are listed)

The proposed action may affect the water quality of any water bodies within or downstream of the site of the proposed action.

The proposed action may cause soil erosion, or otherwise create a source of stormwater discharge that may lead to siltation or other degradation of receiving water bodies.

The proposed action may result in new or additional use of ground water, or may have the potential to introduce contaminants to ground water or an aquifer.



The proposed action may generate 10 tons/year or more of any one designated hazardous air pollutant, or 25 tons/year or more of any combination of such hazardous air pollutants.

The proposed action may require a state air registration, or may produce an emissions rate of total contaminants that may exceed 5 lbs. per hour, or may include a heat source capable of producing more than 10 million BTUs per hour.

Also listed are impacts on transportation, energy, noise, and human health. There are numerous NYS Museum and SHPO identified archaeological sites located within one mile of the project site and/or potential utility improvements. The proposed action may irreversibly convert agricultural land to non-agricultural uses.

“The discharge of toxic chemicals into our waterways poses a direct threat to the environment and human health. Toxic chemicals can accumulate in fish, riverbeds and the water column itself. From there, toxics can be ingested or absorbed by humans, where they can cause infertility, developmental damage, or even cancer. More than half – 53 percent – of rivers and streams in the U.S. assessed by the EPA remain too polluted for swimming, fishing and/or drinking, along with 67 percent of assessed lakes, ponds and reservoirs. Industrial pollution is a major contributor to waterway degradation in the United States. According to the EPA, industrial pollution has left more than 17,000 miles of rivers and about 210,000 acres of lakes, ponds or reservoirs unable to support drinking, swimming, fishing or other uses.<sup>11</sup> Impacts on Local Waterways.”

“Toxic chemicals linked to serious health effects were released in large amounts to America’s waterways in 2012.

- Cancer: Industrial facilities released more than 1.4 million pounds of chemicals linked to cancer into 688 local watersheds during 2012, including arsenic, benzene and chromium. The North Fork Humboldt River watershed in Nevada received the largest release of carcinogens among local watersheds, followed by the Lake Maurepas watershed in Louisiana.

- Developmental damage: More than 460,000 pounds of chemicals linked to developmental disorders were released into more than 600 local

watersheds. Nevada’s North Fork Humboldt River watershed suffered the most developmental toxicant releases among local watersheds, followed by the Lake Maurepas watershed in Louisiana.

- Fertility problems: Approximately 4.4 million pounds of fertility-reducing chemicals were released to more than 600 local watersheds. The Lower Chehalis River watershed in northwestern Washington, which flows into a bay surrounded by wildlife refuges, state parks and beaches, received the second-highest volume of reproductive toxic releases in the nation. Industrial facilities – especially those operated by corporate agribusiness – continue to release high volumes of nitrates into America’s waters.

- Nitrate compounds – which can cause serious health problems in infants if found in drinking water and which contribute to oxygen-depleted “dead zones” in waterways – were by far the largest releases of toxic chemicals in terms of overall weight.” [https://environmentamericacenter.org/sites/environment/files/reports/US\\_wastingwaterways\\_scrn%20061814\\_0.pdf](https://environmentamericacenter.org/sites/environment/files/reports/US_wastingwaterways_scrn%20061814_0.pdf). Are you aware of the health risks that people within the community could possibly be faced with? Has this been discussed and evaluated? Please explain. I think you should seriously consider finding another

location that wouldn't be next to residential areas and so close to people's homes as well as waterways.

Underground storage tanks were found to have leaked tens of thousands of gallons of toxic solvents into the ground in other locations. How can you ensure this wouldn't happen here?? How would this be prevented? Handled?

Eight tributaries of Oneida River and Youngs Creek (NYS Water Index#: ONT-66-11-14-4-1A, ONT-66-11-14-2-1, ONT-66-11-14-1C, ONT-66-11-14-2, ONT-66-11-14-1B, ONT-66-11-14, ONT-66-11-14-4, ONT-66-11-14-4-1), all Class C streams, are located within close proximity to the identified project location. These natural resources should be preserved to the best extent possible. How can you possibly ensure our waterways aren't contaminated?

Ammonia being used in the manufacturing process: This would be something that would linger in the air and not going to be pleasant to be around. How could this possibly be minimized?

Fiscal:

In 2019 White Pine was a finalist for development by a semiconductor company: <https://www.syracuse.com/business/2020/10/mcmahon-onondaga-county-came-close-to-landing-huge-high-tech-manufacturer.html>

The environmental impacts of semiconductor manufacturing are alarming: "To manufacture computer components, the

semiconductor industry uses large amounts of hazardous chemicals including hydrochloric acid, toxic metals and gases, and volatile solvents. Little is known about the long-term health consequences of exposure to chemicals by semiconductor workers. According to industry critics, the semiconductor industry also adversely impacts the environment, causing groundwater and air pollution and generating toxic waste as a by-product of the semiconductor manufacturing process.” <https://ehp.niehs.nih.gov/doi/abs/10.1289/ehp.99107a452>

Quoting Legislator Chris Ryan in 2019: “The taxpayers have been on the hook with White Pine for along time. How much of my tax dollars am I going to have to put back into White Pine so a company that made \$232 billion last year doesn't pay any taxes?” <https://www.waer.org/post/onondaga-county-legislature-invites-amazon-consider-site-clay-2nd-hq>

Residents in Wisconsin were forced out of their homes in recent years for a large electronics giant that has not brought the jobs or revenue that were expected. We can't be sure the same situation would not occur in Clay: <https://www.theguardian.com/us-news/2020/dec/08/wisconsin-foxconn-factory-residents-displaced>

The county of spending unknown money here and you aren't any better prepared today than you were 20 years ago despite your name change from white pine.

Alternatives:

We want to push for another site. We want you to use an existing structure, Brownfield. Why is this not being considered? I am requesting that the four alternatives that were suggested in the GEIS

are taken into serious consideration and considered. You have not provided adequate information as to why taking Burnet Road would be the best route to go and have not touched on exploring other options. Why would you not utilize land that's already for sale on route 31? Is residential land, buying our homes on burnet road cheaper than buying that land? Your GEIS lacks any type of plan for what you intend to do specifically. You do not provide reasonable evidence showing that Burnet Road would be the best option. This is not mitigation. Burnet road properties don't need to be impacted. What is completely mind boggling to me and quite frankly pretty disturbing is that you could actually consider using eminent domain on a church, a place of worship. I mean it doesn't get any worse than that. You could have a smaller scale project go in and put a buffer in so people that want to stay in their homes on Burnet Road could. Why has this not been discussed? I would like these options to be addressed. Your GEIS is way too vague.

In case you thought this was only a Burnet Road thing, make note that we have almost 600 people on our Facebook group page and the number is still growing... we have almost 1400 people now that have signed our petition and that number is still growing. So in case you thought this was just a Burnet Road thing, now you know it's not. The community does not want this here and we are willing to fight and get louder and louder if we have to. This project may have been OK many years ago before all the homes and neighborhoods were there but now it is just too close and this really needs to be considered and addressed.

Have you considered building an underground fence transmission line from our substation and taking it downstate? Downstate could really use the power. Has this option been explored and could this be an alternative?

Traffic/over populated area:

This area cannot handle traffic for a project that's three times the size of the New York State fair. Local people would not be hired. You would be bringing in people from all over the place. You are not going to find 4000 people in this area for this plant. That means housing, that means more traffic. What happens to the value of peoples homes in the area? What happens to the schools, they're already overcrowded as it is do you think they can actually take in more children, that they have the capacity to do so?

Protected species:

We have confirmed with US Fish and wildlife that we have protected species here such as American harts - tongue fern, Indiana bat, Sedge Wren, bog turtle and an eastern massasauga rattlesnake. We also have eagles, red tailed hawks and short eared owls. What happens to all the wildlife that lives here? Has that even been considered? You would be taking away their homes too. What about the deer, the fox, coyotes, etc. How do you mitigate that?

In conclusion:

I do not agree with OCIDA being the agency that goes through these public comments and makes the decisions. The lead agency with invested interest are the ones making decisions here? How can we

trust you won't push things through and find loopholes around things? We can't! We have a right to live in our homes without government interference. We also have a right to stand up for our homes when government does interfere and not be bullied around into selling our homes with your lowball offers!

A massive Industrial facility has the potential to negatively impact our beautiful rural lands, our wildlife, our wetlands, the environment, as well as, contributing to the already chaotic traffic issues, our Burnet Road community and also the surrounding community that are well aware of this and also opposed to it. We oppose development that would force dozens of families out of their homes and affect hundreds of acres of farmland, woods, and natural wetlands. We support development that allows our communities to remain intact. Find another location, perhaps in your backyards? This whole project is driven by greed, nothing but pure greed. Oh yea and read the Lorax to remind yourselves of how absolutely stupid and absurd this is to do. As the flag says, 'Don't tread on me!'

- Michelle Nuzzo

## Questions and comments for consideration

Monica Gnyp <mbarnes79@gmail.com>

Fri 6/11/2021 2:45 AM

To: ED - Web 1 <economicdevelopment@ongov.net>

**NOTICE:** This email originated from outside of Onondaga County's email system. **Use caution** with links and attachments.

Have the environment impacts been studied, particularly long term? Has this info been shared with people at all levels?

Have the local and regional government authorities considered how this will effect future generations?

...have they considered how it will effect current neighbors/neighborhoods? Even if our neighbors at Burnet Road were to leave, what about the test of us?

Why take pristine land and convert it to asphalt and a building too large of a scale for the area? Why not use abandoned land elsewhere in the county, or in another state entirely?

Do you realize how bad our traffic is now? Have you considered how much worse it will become?

No where are there articles of how a facility like this benefits the area it is located in; if one exists, share it with us! Convince the people we have nothing to be scared of. Convince us you are listening to our concerns. Convince us this isn't about money or reelection. Convince us you care.

-one of many concerned neighbors



## SGEIS for White Pines Commerce Park...Proposed Industrial Development in Clay

millspiper@juno.com <millspiper@juno.com>

Fri 6/11/2021 4:42 PM

To: ED - Web 1 <economicdevelopment@ongov.net>

**NOTICE:** This email originated from outside of Onondaga County's email system. **Use caution** with links and attachments.

To Robert Petrovich and Members of OCIDA:

I'm STRONGLY opposed to an Industrial Park in the Town of Clay at the White Pines Park location. I ask that OCIDA does not approve the environmental impact for White Pines Industrial Park.

I am opposed to the secrecy in which this project is shrouded. The Town of Clay Supervisor, Damian Ulatowski, was not aware of your intentions as of September 2020. Tell the public in another open meeting that this project will encompass 4 million square feet of buildings and 50 acres of paved area. It will be almost half the size of Onondaga Lake. The ZOOM meeting on May 24, 2021 is not enough for all to know about this proposed project. Will OCIDA offer more public meetings? Residents want a public meeting with Ryan McMahon, Onondaga County Executive. Will residents get this in person meeting?

Please explain why of the 31 speakers on this ZOOM meeting on May 24, 2021, 20 spoke in favor of this project? Of these 20 speakers all spoke as if reading from a prepared, written statement. Were these individuals emailed, called or in some other way encouraged by OCIDA or anyone associated with Onondaga County government, to provide a very positive statement about this microchip manufacturing plant? Why did not one of these individuals speak about the impact on the environment?

Let all the residents of the Towns of Cicero and Clay know how their lives will be affected. Residents of Burnet Road will be affected the most; however, a project of this magnitude will greatly affect everyone. How will you let more residents know of this project?

Residents on Burnet Road are being threatened by lawyers to sell their homes or be evicted using Eminent Domain. If these residents decide to file a lawsuit to keep their family homes, will the taxpayers be obligated to pay the legal fees and possible settlements associated with these potential lawsuits? OCIDA says they will offer fair market value for Burnet Road residents' homes, yet the offers are substantially lower than fair market. Why are the offers so low?

How will traffic increase in the building of the facility and then its daily operation? Where specifically will you widen roads to deal with this traffic, decreasing residents' front and back yards? Many residents do not realize that their homes are in the pathway to the highways. Will Route 31, Caughdenoy Road and Mudmill Road be made into 5 lane

roadways? How will the 481 North bound exit at Caughdenoy Road be changed? Will an on ramp for 481 South be considered at this location?

Your traffic study was completed 2012. There has been much more development in the area since then. When will another updated traffic study be completed?

How much of an increase in soil, air, and water pollution will there be? Make this information more public prior to the approval of this development.

How will the water waste and solid waste from this facility be dealt with? Will it stay in Onondaga County or be ship elsewhere?

People can not survive without clean, drinkable water. Water is one of New York State's greatest assets. How much water will this manufacturing facility use on a daily basis? Do all the residents along Oneida River and Oneida Lake know of this quantity of water needed for the daily use in manufacturing of microchips? Will lake levels be effected?

"Industrial wastewater pre-treatment may be required on-site by the OCWEP prior to discharge to the Oak Orchard WWTP, if the wastewater strength from the expanded Park exceeds the limits established for discharge to the municipal sanitary sewer system." (pg16) Who is responsible for making this determination about wastewater strength? Will there be a wastewater treatment plant on-site?

"The extensive regional opportunities for outdoor recreation will easily accommodate the potential increase in population that is brought to the area by employment opportunities in the Park. Potential development of the expanded Park is not anticipated to create adverse impacts on community parks and/or recreation facilities" (pg17). Meltzer Park is across Route 31 from this development. How can this project not have an adverse impact with an increase in noise and air pollution? Will additional trees be planted along Sterns Road to serve as a buffer for those who enjoy this park?

"As in 2013, there are no critical environmental areas or significant natural communities within or in the vicinity of the project area. Based on the wildlife species previously observed on the site, potential development at the expanded Park has potential to affect common wildlife species and their associated habitats, although no substantial critical habitat loss is anticipated." (pg23) The habitat is critical to the wildlife that is there now. Are there any endangered species on this land? Who conducted the study to observe the wildlife species?

"Further confirmation of the absence of these species and habitat at the park would be determined through site reconnaissance once a specific development for the Park is proposed." (pg23) Why is confirmation of endangered species not determined before development?

"The North Syracuse Central School District enrollment would be expected to increase approximately 1.6% (136 additional students to the current district student population of 8,500 pupils). This increase in the student population is not anticipated to place an undue burden or create adverse impacts on local schools and educational services." (pg17) Out of 4,000 potential new households only 136 additional children. Where did these numbers come from? Why are not other school districts mentioned as their enrollment may rise too?

"It is anticipated that the expansion of the Park and future development of the Park for industrial semiconductor manufacturing will induce similar cumulative impacts and effects to the area as were identified in the 2013 FGEIS." (pg29) Explain how the cumulative impacts and effects will be similar as identified in the 2013 FGEIS if this is a much larger project ?

How will this project be funded with tax dollars without a guarantee that it will actually materialize. What happens when there is no Federal money? Will the project go through using PILOT funding?

What will happen when the market is inundated with these microchip manufacturing facilities and the White Pines Park will no longer be needed? Who will own the buildings? Who will own the land? Who will be held responsible for the upkeep of the property? Onondaga County taxpayers?

How many vacant, industrial areas are currently in Onondaga County? Even though smaller than White Pines Park, why can't these be utilized first.

I'm opposed to this development mostly for environmental reasons. We as a world are reaching a point of no return on climate change, and yet Onondaga County is pushing to develop another massively large area. There have been so many studies conducted about climate change, global warming and the devastating effects on the planet. The Associated Press just put out an article on June 7th, stating how carbon dioxide levels have hit a new dangerous milestone according to a study conducted by the National Oceanic and Atmospheric Administration. "The world is approaching the point where exceeding the Paris targets and entering a climate danger zone becomes almost inevitable," said Princeton University climate scientist Michael Oppenheimer.

I do not want to live where a climate danger zone is normal. Onondaga County should not be contributing to this danger by destroying more undeveloped lands. Please explain how this project will not add more stress to the planet?

<https://www.syracuse.com/us-news/2021/06/carbon-dioxide-levels-hit-a-new-dangerous-milestone.html>

Currently, how much carbon dioxide does the proposed site of 1,250+ acres cycle into oxygen on a daily basis with all the trees, flowers, grasses, wetlands and wildlife? How much of carbon dioxide will this microchip manufacturing facility produce on a daily basis? What are all the other pollutants that will be added to the atmosphere, soil and water?

How much carbon dioxide will be produced in the making of this facility?

Currently there is no public transportation available to this area in the Town of Clay. How much carbon dioxide will be produced for all the employees once the plant is in operation; most will have to travel by automobile? Will public transportation be made available?

"It is anticipated that areas owned by OCIDA that are north of existing New York Power Authority and National Grid transmission lines will not be developed to avoid actual or potential wetland areas." from OCIDA report.

How large is the area that will not be developed to save as wetlands? What measures will be put in place to insure these wetlands stay protected from future development?

Also, ..".if necessary for potential impacts that cannot be avoided or minimized by a future specific development" Please explain this statement. Are the protected wetlands endangered if more development is needed? Potential impacts can be avoided if this project is built on an already developed site.

Franklin Roosevelt said in a 1935 radio address, " Today we can no longer escape into virgin territory. We have been compelled by stark necessity to **unlearn the too comfortable superstition that the American soil was mystically blessed with every kind of immunity to grave economic maladjustments**, and that the American spirit of individualism--- all alone and unhelped by the cooperative efforts of Government --could withstand and repel every form of economic disarrangement or crisis."

In his address, Roosevelt was referring to the Dust Bowl caused by farming overproduction in the Midwest started by the Homestead Act of 1862. The government made a mistake by developing too much off the land out West. Decades later they are needing to correct these mistake. And in this time in history, some people made money but many suffered unnecessarily. This manufacturing facility will also be a "grave economic maladjustments" for Onondaga County. There are consequences to continually building into virgin territories. Yes, there will be "lots" of jobs to build the facility and "lots" of jobs after it is completed, however, the environmental cost is just too high. More money will be spent correcting this mistake than will be made from this project. A mistake future generations will have to correct and pay for.

Tomorrow, June 12th is my daughter's 24th birthday. We have been discussing this project and the ripple effect of even more development. It is very distressing for both of us. This project and the constant total disregard for the planet, makes her feel very hopeless for her future. It leaves me speechless as I don;t know what to say to eases her worries. Do you Robert Petrovich, support the science behind climate change and the negative effects that comes with it? Can you please explain to my daughter how this project with not have negative effects on the environment?

Be forth coming with your intentions and provide this information to all residents in Cicero and Clay. I want all these questions answered. Once people are aware of the size and magnitude of this project, they will be telling you NO, as well.

**An industrial manufacturing facility does not belong in a residential area.**

Sincerely,  
Darlene Piper  
106 1/2 Northfield Drive  
North Syracuse, NY 13212

## Re: My supplemental to the previous comment and questions regarding White Pine Environmental Review

Shanelle Benson Reid <vote@friendsofdrshanelle.com>

Fri 6/11/2021 8:53 PM

To: Moe Moe Libmatt <mattticket@yahoo.com>

Cc: ED - Web 1 <economicdevelopment@ongov.net>; neilgingoldlaw@gmail.com <neilgingoldlaw@gmail.com>; Michelle Nuzzo <mnuzzo80@yahoo.com>; Cody Kelly <ckell1251@gmail.com>

**NOTICE:** This email originated from outside of Onondaga County's email system. **Use caution** with links and attachments.

Thank you!

Dr. Shanelle R. Benson Reid  
Candidate for County Legislature  
District 14 (Town of Clay)  
PO Box 3424  
Syracuse, NY 13220

*~Friends of Dr. Shanelle~*

*Together Let's Make Our Next Day Our Best Day!*

Sent from my iPhone

On Jun 11, 2021, at 6:04 PM, Moe Moe Libmatt <mattticket@yahoo.com> wrote:

OCIDA,

Document attached.

After speaking with the Environmental Engineer, I had more questions and comments.

Thank you.

<Comments June 11 Environmental Review 06 11 2021.rtf>

Onondaga County Industrial Development Agency - Supplemental Comments

Environmental Review -April 26 and May 6th -

Public Comment Period through June 11, 2021 @ 11:59 pm

White Pine Commerce Park - OCIDA Attempted acquisitions

Onondaga County Industrial Development Agency,

In response to the Review and Hardcopy document. There looks to be much throughout your prepared document that has been copy and pasted.

I do not feel there was adequate detailing of the Green Space and protections there of. Please provide more details in the way of Green Space Protections.

The section regarding Character 3.6 Really speaks to the Agency ( OCIDA ) not having any idea how the future, as in, what this will look like has adequately been addressed. This has a good chance of being another man-made disaster.

The Soils 3.11 Has a process of succession begun? Are previously used soils returning to their original space, as with the process of succession? They must not be disturbed as this would destroy the balance in the Eco-systems. Who is in charge of the Eco-Systems?

Section 4.2.2 Regarding the last paragraph, 'with respect to the acquisition and removal of residential properties to enable the creation and future...' etc. This sentence is infuriating as the resident threatened by this unwarranted attempt at displacing me from the place I call 'HOME'. It is entirely unreasonable for people who are involuntarily displaced to shoulder such costs. As well as the current feelings of anxiety and everyday uncertainty. ( There's no place like HOME )

Section 4.6.2 The Agency knows full well 50 acres of pavement will have a lot of run-off. This increases the speed of water. This will cause erosion. Who was the 'entity' that reviewed and totally underestimated the significant impacts? Did they rubber stamp the lead agencies (OCIDA) document instead of reading the '50 acres of paved parking lot ? 4 milion sq ft build ? Please provide the name and address of this 'entity'. I must contact them directly to express my strong and genuine concerns with this finding.

Section 4.7 ODOR. Is it true there will be ammonia's released into our air? How much exactly? Is it true there will be suspended soils released? How much exactly?

What exactly are all the emissions- Is it 40 - 60 tons? Massive pollution emissions that is down wind of a park, a major wetland, Clay and Cicero's commercial areas. You are allowing residents (children) to breathe the toxic emissions for jobs, jobs, jobs?? Unelected officials and the CEO's and business owners from the zoom call, who do not live around here, do not care about all the down wind major pollution and traffic emissions.

What are the Oils and Greases of this mystery company? How can you actually approve this document on a mystery company? How can this even be valid? Isn't the review conducted to suit

the business coming in? How can you do this and consciously approve this? No conscious. This is so ugly. I am in disbelief of this declaration. 2013's positive declaration and 2021's more acres and a negative one. Why not put an incinerator too - or are they? We don't know because it is the mystery company. I am not buying it.

Population and Growth - 4,000 high paying jobs. Will local people be hired? Or non-local people for the high paying jobs? I think the latter. Community member commented quote, "It is about bringing new people in, while ruining the lives of those who already live here and wanted to be here jobs or not." To this I will respond, many more will lose homes and properties if this travesty is allowed. Many will move away as this beautiful rural land turns to UGLY man-made buildings, acquired by greed and questionable tactics. Those of us in Onondaga County will not be able to wave the flag with pride over this underestimated review and take over, which will result in poor planning due to it being rushed and pushed through as you take advantage of COVID restrictions.

Two towns, Clay and Cicero, will not be happy. There needs to be a cease and desist nuisance abatement order to restrain the County as this action will set precedent for those after us. Those that live on Burnet Road and our outcome will determine future take overs for non- public use. The abuse of eminent domain as I see it.

*Defined : Cease and desist orders; injunctions; land ...* *AN ACT CONCERNING NUISANCE ABATEMENT AND QUALITY OF LIFE. ... A copy of the state's application and the temporary order to cease and desist shall ...*

My quality of life has been disturbed since September 2020, during a Global Pandemic and exploding housing market! Enough of your destroying our sense of value and belonging! My land was not for sale, this seems like an anti-american confiscation as the County Executive speaks to those wishing to remain in their homes as those who are holding out for more money. What ! The goal here is that you make billions and pay us as little as possible. The goal for you is to 'get our property'. My goal is protect this beautiful land and protect my home. I love it here. I have ALWAYS loved it here since I was a little girl. My elderly mother is close. My children are close. The county executive is willing to displace me for his billions and yet he professes "we want too much money for our HOMES" and he collects billions.

Does Onondaga County Industrial Development Agency really think it has a legal right and fiduciary responsibility to buy or take private property and residents' homes using eminent domain or a private mystery business? Many I speak with feel this is an unconstitutional and arbitrary and capricious ( as defined : A willful and unreasonable action without consideration or in disregard of facts or law or without determining principle) misuse of power and financial resources.

Take your mystery company, non- project somewhere else. Leave us alone. I believe due diligence (as defined: due diligence : reasonable steps taken by a person in order to satisfy a legal requirement, especially in buying or selling something. A comprehensive appraisal of a business undertaken by a prospective buyer, especially to establish its assets and liabilities and evaluate its commercial potential has been completely satisfied) I am not satisfied. The community is not satisfied. Take your assumptions to another site.

In closing, I would add I strongly believe Onondaga County Industrial Development Agency being lead agency for this project is a direct conflict of interest! It is like the fox guarding the hen house- as stated from an outsider, The ones that want the land and threaten eminent domain are the ones in charge of

the environmental review for the project. A non-government agency. Blasphemy to sacred, virgin Burnet Road.

Concerned Clay Community member and Burnet Road resident,

Maureen Matthews



June 11, 2021

**The following is a comment on OCIDA's 2021 Draft Supplemental Generic EIS:**

First of all, the entire EIS seems extremely **biased** toward the expansion of the White Pine Commerce Park site. It is certainly not an impartial environmental impact statement. Since OCIDA is the development agency as well as the lead agency of this project, and the findings are so one-sided, it is not appropriate to be presented as valid. This entire EIS should be rewritten by an unbiased agency and reviewed by the DEC as well as the Town of Clay.

The public hearing was odd as well; the (invited?) business owners appeared to read from similar scripts and only spoke of the economic impact of the idea of building a facility, but not on the environmental impact of the particular area chosen, or much of anything the EIS contained, as the agenda stated.

The EIS Alternative sections are not evaluated to any extent. The justification for each is without logic, based on irrelevant factors.

There are several references to **economic impact** in the EIS (p ES4, ES5,2.1,2.2), in the weighing of alternatives. This is not appropriate in an *ENVIRONMENTAL* review.

*Current level of investment* in the site is a sunk cost and should not be used, and especially should not be a reason for preference of an Alternative in an environmental review. (p ES4) Also, the fact that *the technical studies are becoming outdated*, should not be a reason to prefer one Alternative over the other. (p ES4) Both of these points seem outrageously unprofessional to include as valid arguments.

**No brownfield alternative is suggested in the EIS.** It is irresponsible to only consider building on natural land simply because it is cheaper, especially if the scope and funding for this project are nearly as large as it states. The costs of cleanup and land recovery have to be either built into the cost of construction, or the greenfield has to be valued higher than the cost to revert it to its natural state. Prime agricultural land is irreplaceable and should not be used for industrial purposes. Furthermore, the land's current zoning should be respected and not changed. This land is better suited for a farming project. Volume 2, pdf p20 ( page 12 of 13 of the Full Environmental Assessment Form) states that 626 acres are prime agricultural land. This is a significant portion of the project. The loss of farmland in New York State is tragic. According to the American Farmland Trust, more than half a million acres in NY state have been lost to development since the 1980s. There are so many vacant decaying malls, buildings, and facilities in Onondaga County, yet this proposal is for building on prime farmland.

OCIDA's mission does not belong in an environmental statement (page ES5). This has no bearing on environmental impact. It is not justification for harming the environment by converting agricultural and residential property into industrial property, displacing current residents, neighborhoods, and destroying the area's rural character.

#### **Volume I 4.2 Community Character:**

Environmental considerations are defined by NYS to include the character of the area as well as the impact to its neighbors. The Burnet Road area embodies the character of **iconic American rural life**. This is a street where everyone knows each other, bikes are ridden in the middle of the road, kids on laps get tractor rides, turtles cross the road on their own schedule, ducks waddle to the pond at the duck crossing sign, couples play horseshoes in the field *with real horseshoes*. Widows, elderly couples, disabled, new homeowners, and families that have farmed the same land for 150 years, were all told they must sell to OCIDA and leave, *during the pandemic*. The removal of the entire neighborhood of Burnet Rd would cause a **severe impact and hardship** to approximately 40 households, farms and families. In fact, OCIDA has *already caused both financial and emotional harm* to the residents by the harassment and threats of eminent domain in order to intimidate them into “freely” selling their homes.

Adequate reimbursement for displacement of the families on Burnet Road is not possible; there is value beyond the monetary value. Mitigation by EDPL's standards is vastly inadequate for families who have built their own homes and have farmed the same land for generations and do not want (or are unable) to move. It is tantamount to eminent domain abuse: government taking land from private owners to give to other private owners. Even threatening eminent domain without a client should be prohibited since it causes harm and stress to the constituents. Homeowners who are threatened must postpone decisions on improvements, and farmers plant without assurance that they can harvest. There is no mention of this harm to the community in the EIS.

The **social network of families** created over the years is also lost, and for many, such as the disabled neighbor, or the elderly widows, who rely on this trusted support system, quality of life would suffer. There is no mention of this harm to the community, in the EIS.

The EIS disregards the nearby existing neighborhoods and **population growth** that has occurred during the 20 years that this Business Park has sat idle. The community has grown and the population density has increased significantly in the area. The Alternatives need to be re-evaluated with consideration of the growth of the local population, instead of from the point of view of OCIDA's sunk costs.

**Traffic problems** are not fully evaluated. **Route 31 is only a two lane road**, and is already overloaded now. With a large development there, it will be worse. Widening it in both directions would be extremely problematic in most areas, and would impact many many households. This is not addressed in the EIS, only in specific areas of intersections. The traffic study is not complete.

The **proximity of the CSX railway has not been addressed in terms of the vibrations** that trains cause, and its effect on semiconductor fabrication. Seismologists, in fact, sometimes use trains in their models in order to understand seismic waves. Semiconductor fabrication is very sensitive to vibration.

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## Volume II Full Environmental Assessment Form, Part 1:

**C3. Zoning.** This section **omits the Agricultural zoned area** that is privately owned on the eastern side of Burnet Road.

**This project is not consistent with the zoning of this part of the Town of Clay.** There should be no rezoning, since it would be such a large area and a major change for the town and inconsistent with the previous town plans. The Northern Land Use Study of Clay NY Summer 2013 (<https://www.townofclay.org/sites/default/files/u1291/Northern%20Clay%20Study%2005-2013.pdf>) states:

**“It has long been the Town’s vision to keep the northern part of Clay as low-density, with non-intensive land uses.”** (Town of Clay Zoning Code, Clay-Cicero Route 31 Transportation Study, Routes 31 & 57 Land Use and Circulation Study.)

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The area west of the old border of the park (**west side of Caughdenoy Rd**) is already zoned industrial. Why is this not included in any of the Alternatives? It would lower the lengths of sewer and gas lines needed. It would avoid displacement of Burnet Rd residents. It would not require rezoning.

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## Volume II

Exhibit A: Full Environmental Assessment Form, Part 1:

Page 10 of 13 (p18 of the pdf file)

E1 Natural Resources:

***E. 1. c. Is the project site presently used by members of the community for public recreation?*** Check box is checked **NO**, but should be checked **YES**. There are many people who ride bikes, ATVs, golf carts, tractors, and walk up and down Burnet Road, and on the paths in the woods, as well as under the power lines. In the winter, people frequently cross country ski on the road and on the trails in the woods, as well as ice skate on the deeper parts of the swamp. There is a well-known snowmobile trail running east-west through the northern part of the property, near the power lines (trail C7L, NYSSA), as well as across the fields and north of Route 31. The road is known by joggers including the local school teams, because of its rural nature, the minimal traffic and slope, and adequate length without intersections. Bird watchers and photography enthusiasts frequently visit the area. Hunters park along the sides of the road and head into the woods as well.

Page 12 of 13: (p20 on pdf)

E2 Natural Resources:

**E.2.q. Is the project site or adjoining area currently used for hunting, trapping, fishing or shell fishing?** Check box answered is NO, but should be YES. Many areas of the site are often used for hunting.

Page 13 of 13: (p21 on pdf)

E2 Natural Resources:

**Does the project site contain, or is it substantially contiguous to, a building, archaeological site, or district which is listed on the National or State Register of Historic Places, or that has been determined by the Commissioner of the NYS Office of Parks, Recreation and Historic Preservation to be eligible for listing on the State Register of Historic Places?** Checked box is **NO** but should be checked **YES**.

Note that in Part 1 of the EIS ES20 (p 24 pf the pdf) it states:

"Per the New York State Cultural Resource Information System (NYS CRIS), 13 previously identified above-ground historic resources are located within the expanded Park area. Two of these resources are located on the north side of NYS Route 31 and the remaining 11 resources are located along Burnet Road. Seventeen additional previously evaluated resources are located within the immediate vicinity of the expanded Park. Of the 30 previously identified resources, one resource has been determined eligible for listing in the National Register of Historic Places (NRHP) by the New York State Historic Preservation Office (NY SHPO) and 20 have been determined ineligible. *The eligibility status of the remaining 9 resources is undetermined.*"

**Several houses are historic** to the point of having cisterns in the basement, built in the 1800s. They should not be demolished. This section has not been investigated.

#### **Volume II Full Environmental Assessment Form:**

Part 2: page 2 of 10 (p27 pdf)

##### **3.Impacts on Surface Water**

**c. The proposed action may involve dredging more than 100 cubic yards of material from a wetland or water body.** Check box marked is **"Moderate to large impact may occur"**.

This is a **contradiction** of the previous answers to questions on page 5 (p13 of the pdf Vol 2):

**iii. Will the proposed action cause or result in disturbances to bottom sediments:** the checkbox **NO** is checked.

**iv. Will the proposed action cause or result in the destruction or removal of aquatic vegetation?** The checkbox **NO** is checked.

#### **Volume II Full Environmental Assessment Form,**

Part 2: page 5 of 10 (p30 of pdf)

##### **7. Impact on Plants and Animals**

**g. The proposed action may substantially interfere with nesting/breeding, foraging, or over-wintering habitat for the predominant species that occupy or use the project site.** Checked box is **"No, or small impact"**, but should be checked **"Moderate to large impact may occur"**. The local wildlife, including many species of birds and hawks, bats, coyotes,

rabbits, deer, turkeys, bees, mice, moles, etc., will be significantly affected in all their activities, if construction occurs, and if 50 acres are paved. It is not possible for this proposed development to have only a small impact.

## **Volume II Full Environmental Assessment Form,**

Part 2: page 7 of 10 (p32 of pdf)

### **Number 11. Impact on Open Space and Recreation**

**11. a. The proposed action may result in an impairment of natural functions or ecosystems services provided by an undeveloped area, including but not limited to stormwater storage, nutrient cycling, wildlife habitat.**

This should be checked "**Moderate to Large Impact**". The undeveloped areas are like giant sponges for the stormwater storage. If 50 acres are paved, and buildings are built, the water runoff will affect the other surrounding areas. The mitigation suggested (earthen berms etc) will not be adequate.

This whole section seemingly was omitted because of the technical classification of an open space resource, but this area effectively acts as one. The open spaces should be treated as a valuable and protected resource. This entire section is marked incorrectly.

**11.b. The proposed action may result in the loss of a current or future recreational resource.**

This should be checked "**Moderate to Large Impact**".

The area has many many recreational activities as described above in this note. This will all be lost if development occurs.

**11.c. The proposed action may eliminate open space or recreational resource in an area with few such resources.**

This should be checked "**Moderate to Large Impact**".

Open space nearby is getting increasingly hard to find because of increased development in the area. Clay and Cicero have grown over the last decade, and are more populated with much more traffic. The rural quality of Burnet Rd and the natural fields and forests nearby are a significant and welcome contrast.

**11.d. The proposed action may result in loss of an area now used informally by the community as an open space resource.**

This should be checked "**Moderate to Large Impact**".

This area is used constantly as an open space resource as described previously in this note. It is an important habitat for local wildlife and these natural areas have positive impacts on the the air quality, environment, and health of all those nearby. Building and paving these areas would remove these positive impacts and introduce negative ones.

p10.of 10 (p35 of pdf)

### **17. Consistency with Community Plans**

**c. The proposed action is inconsistent with local land use plans or zoning regulations.**

This should be checked **"Moderate to Large Impact"**.

A semiconductor facility is not consistent in the current zoning. This is a huge amount of land that would be involved in a zone change from residential/agricultural to industrial.

p10 of 10 (p35 of pdf)

**18. Consistency with Community Character**

18.1. The proposed project is inconsistent with the existing community character.

**a. The proposed action may replace or eliminate existing facilities, structures, or areas of historic importance to the community.** Check box is marked as **"No or small impact may occur"**. - The proposed action would eliminate the *entire community* of Burnet Road. Burnet Road has existed for more than 150 years. The **"Moderate to Large impact may occur"** checkbox should be marked!

**c. The proposed action may displace affordable or low-income housing in an area where there is a shortage of such housing.** Check box **"No or small impact may occur"** The **"Moderate to Large impact may occur"** should be checked! Based on the current purchase proposals OCIDA has made to Burnet Rd residents for their modest homes, including several offers at approximately 60% FMV, and the current hot real estate market, these residents will have a difficult time finding any replacement, especially similar to a low-density rural setting like Burnet Road.

We are opposed to the development of this project in this location. During the 20+ years the Clay Business Park / White Pine Commerce Park has sat vacant, the population has grown significantly in this area, and this sort of mega facility is not appropriate in a residential area. It is inconsistent with the zoning and the Town of Clay is already overwhelmed with development and traffic problems. This project is an opportunity for the county, yet the planners have made several unfortunate decisions in the location and the implementation. This area with its prime farmland soils, would be best suited for some sort of agricultural project, combined with nature trails, or a wildlife preserve. The wetlands in the north are necessary and sensitive environmental resources and should be protected.

OCIDA's mission to facilitate industrial development and job creation in Onondaga County, should not override its constituents' rights and quality of life. The agency should respect the current zoning and it should not be purchasing or holding any residential/agricultural land.

Regards,

B. Serog & P. Goldsman  
8756 Burnet Road  
Clay NY 13041

## White Pines Development

jtdeeg@aol.com <jtdeeg@aol.com>

Fri 6/11/2021 10:52 AM

To: ED - Web 1 <economicdevelopment@ongov.net>

**NOTICE:** This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

I have lived in Clay for over 50 years. There has been much residential development along with many businesses. But I am not on favor of building a semi conductor facility on farm land or ousting residents from their homes. The solar field is less than a mile from my home. I object to the north area of Clay becoming a manufacturing hub.

Therese Deegan

***David W. Wilhite, PE, PMP, MSCE  
CAPT, CEC, USN***

***White Pine Commerce Park – Public Comments 11 June 2021***

OCIDA Leadership, I only ask that you take a hard look at the future impacts of your decisions to rural Clay and Cicero and Greater Onondaga County. I do not support the use of eminent domain to achieve the overall objectives of OCIDA in the White Pine Commerce Park endeavor, and after the reviewing all DSGEIS and the imminent environmental impacts, I don't think rural Clay and Cicero and Greater Onondaga County is the right place for the semiconductor industry.

**Environment and Human Health**

The citizens of Clay and Cicero deserve to know that the proposed economic growth for the area comes with a hefty environmental price tag. The questions I am asking deserve answers.

- 1) Do the materials needed to produce semiconductor chips include high corrosive and toxic materials to include hydrochloric acid, metals such as arsenic, cadmium and lead?
- 2) Do the materials needed to produce semiconductor chips include volatile solvents such as methyl chloroform, toluene, benzene, acetone and trichloroethylene?
- 3) Do the materials needed to produce semiconductor chips include toxic gases such as arsine?

Many of these chemicals are known as being human carcinogens.

Does the U.S. Department of Labor's Bureau of Labor Statistics show that semiconductor workers have a rate of occupational illness resulting in lost workdays that is twice as high as that of workers in other manufacturing sectors?



Do women that work in the semiconductor industry have a higher miscarriage rate than women working in other manufacturing industries?

How many lawsuits globally have been filed against the semiconductor industry globally by women that have developed cancer and reproductive problems as a result of working in a semiconductor plant?

How will OCIDA address the semiconductor industry's environmental impact to the rural Clay and Cicero, and greater Onondaga area that is well documented by EPA and numerous environmental lawsuits?

Is pristine rural Clay and Cicero and Greater Onondaga County New York the place for this type of industry, with populations of 58,998, 30,757 and 458,286 respectively? Or is a remote, controlled, desert location better suited for this type of industry?

As you know, there are largely populated areas just south of State Route 31.

### **Chemicals of Concern in the Semiconductor Industry:**

#### **Acetone**

- Inhalation of moderate to high levels causes nose, throat, lung, and eye irritation; confusion; and possibly coma
- Ingestion of very high level causes unconsciousness and damage to the skin in the mouth
- Long-term exposure in animals causes kidney, liver, and nerve damage; increased birth defects; and lowered ability to reproduce in males

#### **Arsenic**

- At low levels causes nausea, vomiting, diarrhea, decreased production of red and white blood cells, abnormal heart rhythm, and blood vessel damage

- At high levels over 60 parts per million causes tissue damage (nerves, stomach, intestine, skin) and may be fatal
- Chronic exposure causes lung cancer
- Known human carcinogen

### **Arsine**

- Causes headache; malaise; weakness; dizziness; dyspnea; abdominal and back pain; nausea; vomiting; jaundice; peripheral neuropathy; and damage to the blood, kidneys, and liver

### **Benzene**

- Causes damage to bone marrow and decreased production of red blood cell leading to anemia, excessive bleeding, immune system effects, increased chance of infection, reproductive effects, and leukemia
- Known human carcinogen

### **Cadmium**

- Causes lung damage, renal dysfunction, hepatic injury, bone defects, hypertension, reproductive toxicity, and teratogenicity
- Reasonably anticipated to be a human carcinogen

### **Hydrochloric Acid**

- Highly corrosive
- Causes severe eye and skin burns and conjunctivitis; prolonged or repeated skin contact may cause dermatitis
- Inhalation causes severe respiratory irritation with coughing, burns, breathing difficulty, and possible coma
- Ingestion causes digestive tract irritation, abdominal pain, vomiting, and possible death
- Also causes photosensitization in certain individuals and circulatory system failure

## **Lead**

- Damages kidneys and the immune system
- Causes premature birth; low birth weight; decreased mental ability; learning deficits in children; decreased reaction time; weakness in fingers, wrists, and ankles; anemia; memory effects; spontaneous abortion; and damage to the male reproductive system

## **Methyl Chloroform**

- Causes headache; CNS depression; poor equilibrium; eye, nose, throat, and skin irritation; and cardiac arrhythmia

## **Toluene**

- Long-term exposure to low to moderate levels causes tiredness, confusion, weakness, memory loss, nausea, and hearing loss
- Inhalation of high levels over a short period of time can cause permanent damage to the brain and speech, vision and hearing problems, loss of muscle control, and poor balance
- Causes neurological problems and retarded growth in children
- A human carcinogen

## **Trichloroethylene**

- Irritates the eyes and respiratory tract
- Inhalation causes dizziness, sleepiness, and headache
- Chronic exposure causes speech and hearing impairment, kidney disease, blood disorders, stroke, anemia, diabetes and skin rashes
- A human carcinogen

If OCIDA really cares about the citizens of Onondaga County, you will reconsider bringing the semiconductor industry to the area.

## **Jurisdictional Authority Conflict of Interest**

Because of the project's size and potential for both catastrophic and long lasting cumulative environmental and community character impacts to Clay, Cicero and Greater Onondaga County New York, and the fact that it conflicts with New York State environmental and climate change policies, I strongly urge that NYDEC to assume lead agency status for the environmental review of the White Pine Commerce Park proposal DSGEIS under SEQRA. In addition, OCIDA's and Onondaga County's clear financial interest in the revenues generated from a use and occupancy agreement, if granted, presents a conflict of interest that makes OCIDA an inappropriate lead agency or co-lead agency.

## **Environmental Justice**

The EPA's Definition of Environmental Justice: "Fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies."

How would Fayetteville or Skaneateles receive a Semiconductor Manufacturing facility less than a mile from their town center?

"No group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies."

## **Meaningful Involvement means:**

1. People have an opportunity to participate in decisions about activities that may affect their environment and/or health;
2. The public's contribution can influence the regulatory agency's decision;
3. Community concerns will be considered in the decision-making process;

4. Decision makers will seek out and facilitate the involvement of those potentially affected.”

### **A Personal Note**

Our family decided to move from Nashville TN to the Clay, NY Onondaga County area in November of 2019 when I received my final Navy Active-Duty Orders to the Pentagon. Our decision was to build our final home in this area and I would commute to and from the D.C. area on the weekends until I finish my 3 year orders. We found Martin Custom Homes and started discussing having their company find land for us to build on. Our desire was to purchase about 3-5 acres of land in the secluded woodland area but still be close to everything as well as have our children in the North Syracuse School District. Andrew Martin was able to find 5 acres of land to purchase on Burnet Road for us to build our “forever” home. This process started at the end of 2019. I flew to Syracuse in January of 2020 to select this lot with the builder. Because of Covid our closing documents etc. were a little behind but we closed on our “new construction” home April 28th, 2020. The lot had already been purchased by the builder for us and had been cleared and prepped for septic, which was approved by Onondaga County Division of Environmental Health. Covid did slow things down quite a bit but our home was complete and ready to move in the first of November 2020. Around the middle of October there was a letter in our mailbox from a concerned neighbor explaining the situation with the County and White Pine Commerce Park desiring to purchase all of the land on Burnet Road – keep in mind we had not even moved into our new home at this point, however were already financially obligated at that point. We called our builder who told us he knew nothing about it, nor did the Town of Clay when asked. We then spoke to Mr. Bob Petrovich and asked what was going on, he explained that he eventually would like to acquire our property. As time went on our family decided to just focus on getting settled into our new home and enjoying the holidays – this was rather hard to do with this looming over our heads and especially during a pandemic. In January we requested a meeting with Ryan McMahon and

Bob Petrovich in which we were told how great the semi-conductor project being marketed for this area would be for the whole county and a lot of other sales tactics. In the middle of March we received aggressive offers for acquiring our property to the point that my wife had to ask Bob Petrovich not to call her, as he was creating too much stress while she was trying to remotely teach our 3 children. We do not wish to sell our brand-new home, you do not have a corporation signed and this is NOT the place for a sprawling semiconductor manufacturing complex and campus. No amount of money is equal to having to move 3 children and an entire household just because neighbors look bad. You cannot market property that you do not own. The 5.5 acre property that our home is now situated has been undisturbed since 1945, possibly even before that point and suddenly NOW, because of political aspirations, the County feels it has the right and authority to threaten us out of our home. I am an Active Duty Navy Captain with over 37 years military service and this is how you treat an two time combat tour OEF/OIF Veteran that has just moved his family to the upstate New York area.

### **Community Character**

The small section on Community Character in the DSGEIS does not discuss or elaborate on the community character impacts nor does it over any mitigation strategy.

“Community character is the sense of place and identity that is formed through the dynamic interaction of people with their surroundings. It is what makes a house a home and a series of houses a neighborhood. It is a community’s perception of itself and is “shaped by time, experience, and action within the social, economic, historic, environmental, and cultural contexts of a specific place. As a composition of these various elements, community character is an intangible manifestation of a community’s relationship with the landscape—its cultural landscape.”

The DSGEIS fails to properly define community character and addresses the concerns embodied in SEQRA.

New York has a strong history of “home rule,” such that local governments have broad powers to which the courts accord significant deference. Because land use has always been recognized as the province of state and local governments, there is concern that a town’s comprehensive plan might be disregarded by the NYDEC. However, rulings have clearly stated that the jurisdiction of the NYDEC does not change under SEQRA and that SEQRA is not limited by local laws. While many applicants argue that home rule prevails and that consistency with local zoning ordinances or comprehensive plans is sufficient to evaluate compatibility with a town’s desired design, the general trend is for decision makers to require their consideration in addition to other factors.

For this reason I reemphasize that OCIDA has a clear conflict of interest, and that NYDEC should assume lead agency for the environmental review. NYDEC, as the State’s environmental agency, is in the best position to conduct the necessary and thorough environmental review that this project demands.

Further, the evaluation of a proposed project’s impacts on the cultural landscape of an area should include the consideration of impacts on the broader experience of a place felt by all those affected. This is not unprecedented, as the NYDEC’s visual impact analysis program policy requires that the visual assessment cover a five mile radius, which can spill outside of the community in which a project is sited. Visual: 2

## **Zoning**

Blanket zoning provisions provide notice to future developers regarding a town’s desired land use patterns, but they do not allow for public input regarding the full range of impacts a proposed project may have on the community, which is a necessary and important part of the environmental review process.

The mechanisms that purport to contribute to this task, such as zoning ordinances and environmental impact review requirements, are inadequate at present. Zoning regulations deal only with a particular municipality's aesthetic and land use desires, meaning that the broader areas and landscapes that might be impacted by a proposed project are left unprotected.

### **Zoning and Community Character**

The White Pine Commerce Park, if approved, will ruin the community character of rural Clay, Cicero and Brewerton, NY. Simply re-zoning, specifying industrial use, is not sufficient to encompass the full impact on the entire area and community character. Environmental impact review has the most potential to preserve cultural landscapes in New York, as New York's "little NEPA," the State Environmental Quality Review Act (SEQRA), requires the evaluation of a project's impacts on "community or neighborhood character. The courts accord significant regard to communities seeking to protect their character by enacting regulations and zoning ordinances to promote aesthetic values, pursuant to the broad reach of the "public welfare" that the states are charged with protecting.

### **Comprehensive Land Use Planning and Community Character**

Comprehensive plans allow communities to "maintain their neighborhood character through common, implied and established expectations underlying the current state of the community, while at the same time generally recognizing private property rights." Unlike zoning, comprehensive plans involve open communication and work by urban planners who are less likely than town planning board members to be motivated by prejudices, include long term goals and desires regarding future development, and are adopted after the legislative body approves them by vote.



## **Traffic Impacts**

The citizens of Clay, Cicero, Brewerton and North Syracuse deserve to know the specific traffic impact and what they will be facing on a daily basis, in laymen's terms. Not in a report and tables that they don't understand. And the assumption that it will be 4,000 employees is based on what? Additionally, what is the commensurate transportation improvement plan to mitigate the additional traffic impacts? What is the cost? Who pays? Traffic 5, 6

The Traffic Impact Study Report by JMT and Associates already observed the following existing negative traffic issues:

- Motorists passing in the shoulder around left-turning vehicles
- Long queues in the eastbound direction approaching I-81
- The eastbound and westbound left turn lanes at I-81 do not have enough storage and long queues occur with vehicles spilling into the through lanes, which causes weaving especially in the westbound direction near I-81;
- The I-81 queuing affects Lakeshore Road with additional weaving of approaching vehicles access at business driveways or getting around vehicles waiting to get onto the ramps; and
- The skewed approaches of Lakeshore Road and Maple Road/NYS Route 481 Northbound Off Ramp Intersection forces confusion and quick decision making.

The existing AADT on SR 31 between Caughdenoy Road and Lawton Road is 10,470, what is the projected AADT once the White Pine Commerce Park is built-out?

The existing %Truck Traffic on SR 31 between Caughdenoy Road and Lawton Road is 4%, what is the projected %Truck Traffic once the White Pine Commerce Park is built-out?

The DSGEIS states "An increase in traffic will result from construction and development of the Park. Traffic is also projected to increase from

other developments occurring in the area and will change the existing levels of service (LOS) at certain intersections along NYS Route 31. Therefore, roadway improvements along NYS Route 31 are proposed based on existing and future traffic volumes. Regardless of development at the Park, transportation improvements will be required along NYS Route 31 as other development occurs over time.

This is very vague and doesn't convey to the public what to expect in terms of traffic impacts. Another attempt by OCIDA to push approval of the project through with little to no push-back from the public.

Gridlock is what the public can expect, without serious modifications to SR 31 and the SR31/SR11 and I-81 intersections/interchanges.

The statement in the DGEIS "If changes occur to how the Park is accessed and volumes increase on Caughdenoy Road beyond those currently projected and modeled..." Indicates that OCIDA and their consultant JMT and Associates really don't know at this time what the traffic volume and characteristics will be, it's all assumptions and speculation until the corporation/s that will occupy the commerce park present employee and logistics data.

The DGEIS also states "As the level of service analysis shows, there are intersections and movements that are projected to fail by 2044. The main areas of concern are at the NYS Route 481 interchange and NYS Route 31 between US Route 11 and the Interstate 81 ramps. These areas are projected to be failing or near failing by 2044. Any improvements beyond 2024 need to be reviewed for mitigation at a later time."

The intersections and movements will fail sooner than 2044 with the White Pine Commerce Park and the cost will be astronomical.

The public deserves to really understand the impacts to their lives in terms of construction and traffic impacts. The following statement minimizes what will be a years-long process that will cripple the mobility of citizens in the area.

“A new Traffic Impact Study (TIS) was prepared to evaluate potential traffic impacts associated with the proposed expanded Park area. Due to the generic nature of this review, the TIS includes more generic as opposed to specific development details and follows the assumptions to develop the traffic impact of the proposed expansion and potential development, which include supporting between 3,750 to 4,000 employees (4,000 used for analysis), having a minimum of two driveways for site access: one driveway will be connected to Caughdenoy Road and the other will be connected to NYS Route 31; operating 24 hours a day and seven days a week with three equally sized rotating working shifts; and development of the Project site will be completed and operational by the year 2024.”

### **Schools**

The DSGEIS analysis on schools is unrealistic. First we really don't know if it will be 4,000 households until the county receives employee and logistical data from the corporations coming to White Pine. Second as the DSGEIS states....”An increase of approximately 136 students is not anticipated to place an undue burden on local schools and educational facilities. The development of the Park is not anticipated to create adverse impacts on local schools and educational services. No mitigation is required.”

How did OCIDA arrive at that number? Say there are only 4,000 new households and each household had only one child, that would be 4,000 new students....but say some of those families don't have any children....the US Census Bureau states that on average every US Household has 1 school aged child, that would be 4,000 students. In New York the average is 1.81 to 1.9 children per family. That would be 7,240-7,600 students. Who is paying for that?

## **Segmentation**

Agencies (OCIDA) are required to consider connected actions in the same EIS. 40 C.F.R. §1508.25(a)(1) (2019). This requirement prevents agencies from engaging in segmentation that is circumventing NEPA by not studying the cumulative impacts of a single project. “This rule against segmentation was developed to prevent the piecemeal environmental analysis of interrelated projects, which could give an inaccurate impression of overall environmental effects.”

OCIDA has not provided, however are required to, perform a Programmatic EIS (PEIS) to consider the Impacts of the Project within the Context of the Greater Regional Plan. In addition to the prohibition in NEPA against segmentation, NEPA requires that, if a “systematic program is likely to generate disparate yet related impacts,” the Agencies must at least consider whether a Programmatic EIS (PEIS) is required and must articulate “a rational connection between the facts and the choice made.” *Found. on Econ. Trends v. Heckler*, 756F.2d 143, 160 (D.C. Cir. 1985) (quoting *Burlington Truck Lines, Inc. v. United States*, 371U.S. 156, 168 (1962)).

OCIDA has been approving individual SEQRA Resolutions on properties on Burnet Road, which appears to constitute segmentation.

Agencies (OCIDA) are required to consider connected actions in the same EIS. 40 C.F.R. §1508.25(a)(1) (2019). This requirement prevents agencies from engaging in segmentation, that is, circumventing NEPA by not studying the cumulative impacts of a single project. “This rule against segmentation was developed to prevent the piecemeal environmental analysis of interrelated projects, which could give an inaccurate impression of overall environmental effects.”

## **Cumulative Impacts**

The 5.1 cumulative impact section of the DSGEIS does not address all of the criteria required in 6 NYCRR [617.7(c)(1)(I-xii)]. Nor does the 5.2 mitigation section adequately address all the cumulative impacts.

The cumulative environmental and human health, environmental justice, zoning, community character, schools and traffic impacts are staggering. Nor were the following adverse impacts adequately addressed: a substantial adverse change in existing air quality, ground or surface water quality or quantity, traffic or noise levels; a substantial increase in solid waste production; a substantial increase in potential for erosion, flooding, leaching or drainage problems;

the removal or destruction of large quantities of vegetation or fauna; substantial interference with the movement of any resident or migratory fish or wildlife species; impacts on a significant habitat area; substantial adverse impacts on a threatened or endangered species of animal or plant, or the habitat of such a species; or other significant adverse impacts to natural resources; the impairment of the character or quality of important historical, archeological, architectural, or aesthetic resources or of existing community or neighborhood character; a major change in the use of either the quantity or type of energy; the creation of a hazard to human health; a substantial change in the use, or intensity of use, of land including agricultural, open space or recreational resources, or in its capacity to support existing uses.

The DSGEIS does not adequately discuss changes in two or more elements of the environment, no one of which has a significant impact on the environment, but when considered together result in a substantial adverse impact on the environment.

## **Stormwater**

In the Stormwater/Drainage/Flooding - Minimization and Mitigation section of the EIS, it mentions “As a part of the SPDES Construction General Permit (GP) and Stormwater Pollution Prevention Plan

(SWPPP), and Municipal Separate Storm Sewer System (MS4) SWPPP acceptance form from the Town of Clay and the Town of Cicero “may” be required, depending on the offsite locations of the stormwater discharges.” ----- With a proposed project of this size and environmental magnitude, the entire site will need to be included in the MS4, and it currently is not. (Map Attached) And the off-site stormwater discharge locations will be extremely important, as they drain into Youngs Creek, Oneida River and Oneida Lake, as well as into the wetlands on the property.

The following rationale that the environmental impacts are less important than the social and economic need for the project, cannot be substantiated.

“If complete avoidance is not practicable for development activities that are not exempt from regulation, development would proceed with permits issued by NYSDEC and/or the USACE. NYSDEC has a designated Class II and a designated Class III wetland near or within the Project site, which are associated with intermittent streams that flow into Youngs Creek, an unregulated Class C, non-navigable stream. A permit application would be submitted to NYSDEC, or a Joint Application to the NYSDEC and USACE in a case of concurrent jurisdiction. Issuance of a permit would be based, in part, on a showing that losses or impacts on the functions and benefits of the wetland have been minimized and the social and economic need for the Project.”

And I don’t understand how these surface waters are “Class C and not considered protected.”

Actually Oneida River Basin is Class B, some of the tributaries are class C.

[https://govt.westlaw.com/nycrr/Browse/Home/NewYork/NewYorkCodesRulesandRegulations?guid=I38b21560b5a111dda0a4e17826ebc834&originationContext=documenttoc&transitionType=Default&contextData=\(sc.Default\)](https://govt.westlaw.com/nycrr/Browse/Home/NewYork/NewYorkCodesRulesandRegulations?guid=I38b21560b5a111dda0a4e17826ebc834&originationContext=documenttoc&transitionType=Default&contextData=(sc.Default))

“With the expansion of the Project area, the number and size of potentially impacted wetlands and natural water bodies has increased. The expanded site encompasses 17 National Wetland Inventory (NWI) mapped wetlands and two state-regulated wetlands. Classified waterbodies present onsite are tributaries to Oneida River. These surface waters are Class C, and are not considered protected; however, any disturbance would require prior approval from the United States Army Corps of Engineers (USACE) and/or the New York State Department of Environmental Conservation (NYSDEC).”

The DGEIS fails to Identify Stormwater volume and pollutant loads.

The DGEIS fails to take a hard look at how increased stormwater will affect the receiving waters of Young’s Creek, Oneida River, Oneida Lake and/or Lake Ontario.

I reiterate my earlier statement, because of the project’s size and potential for both catastrophic and long lasting cumulative environmental and community character impacts to Clay, Cicero and Greater Onondaga County NY, and the fact that it conflicts with New York State environmental and climate change policies, I strongly urge that NYDEC to assume lead agency status for the environmental review of the White Pine Commerce Park proposal DSGEIS under SEQRA.

### **Further White Pine Commerce Park DSGEIS Questions**

- 1) How was the 1253 Acre requirement derived? Was it simply derived from the fact that Taiwan Semiconductor Manufacturing Company Ltd. requested that large of a footprint? Was there any other industry standard analysis completed that proves that you need that much land for this project? And was the entire DSGEIS written to that desired end result? OCIDA proclaims that 1253 Acres is needed, therefore all the property on Burnet Road and the Nazarene Church needs to be acquired. It appears that all of the alternative analysis were

written to that desired end state without any real compelling analysis or justification.

- 2) The DSGEIS states “This may translate into a buildout encompassing approximately 4.0 million square feet of industrial development at the Park. This would equate to approximately 400 acres of surface disturbance (temporary and permanent) within the Park developed in a campus like setting that would be sited to avoid regulated wetland areas.” The same question applies for the prime developable land 732 acre requirement, where did that number come from? Do you even have a site-plan at this point? It appears that due-diligence on exploring Alternatives has not been fully vetted and OCIDA is going to displace the residents of Burnet Road over speculation and conjecture.
- 3) OCIDA really doesn’t have a “need” as defined in EDPL and the Supreme Court to acquire the property until they have a company signed, analysis completed with a site plan approved that necessitates the acquisition of 1253 Acres.
- 4) 4) Is one of the purposes of the DSGEIS for OCIDA to be able to market 1253 Acres, and is that, in and of itself, adequate justification for destroying the lives of the people on the 30+ residents on Burnet Road? It would be different if OCIDA had INTEL signed and they said they needed exactly that much land, but they don’t. OCIDA could acquire all the land on Burnet Road and the Nazarene Church and the land could sit vacant for years.
- 5) Has OCIDA looked at the alternative of building a 1 Gigawatt substation in another location? What is that cost? Why isn’t that discussion in the DSGEIS?



- 6) Has OCIDA looked at buying property south of State Route 31? Building a bridge over SR 31? or going north of the Power easement with a road or a bridge? What is that cost? Why isn't that in the DSGEIS?
- 7) The legal/mental summersault that the DSGEIS states cannot be substantiated. "the smaller footprint could result in development located closer to residential locations that are not acquired by OCIDA, thus creating greater potential environmental impacts. In contrast, the preferred alternative would allow future tenants additional acreage on-site sufficient to construct necessary buildings and accessory uses, buffer development from adjacent lands, and avoid impacts to ecological resources such as wetlands to the maximum extent practicable."
- 8) Alternative 4, a project in a different location was not fully analyzed, with discussion on other sites.
- 9) The community has been allow zero involvement of the decision making process on the White Pine expansion....It has been a behind-closed-door scheming and decision process by the OCIDA Oligarchy...empowered by New York State Municipal Home Rule.
- 10) Has OCIDA been intimately involved in the review and editing of this DSGEIS to their liking? Is that a conflict of interest? Is that permitted by the New York State Board of Architects and Engineers? Is that permitted by NYDEC?
- 11) Are the number of employees 4,000 or  $4,000 \times 3 \text{ Shifts} = 12,000$  employees and is the Average Daily Traffic based on that?

- 12) Alternative number 3 in the DSGEIS does not discuss a different Acre size, closer or a little larger to the 732 acres the report speculates that's required....Why hasn't an 800 -900 acre alternative been explored? The reports following argument doesn't pass the reasonably person test. "Although this alternative considers the idea of potentially maximizing development space within a smaller area, much like Alternative 2, the smaller footprint would not allow for the potential of larger industrial and commercial developers, such as the semiconductor industry. The proposed expanded footprint of the Park allows OCIDA to market to a larger, more diverse mix of industries than it had previously. The smaller sized park would not support the main objective, which is to attract a broader scope of industries such as the semiconductor industry that require large campus type settings with greenspace and ample buffering from environmental receptors and would bring high tech and high paying jobs to Onondaga County. Like Alternative 2, the smaller expansion alternative does not maximize the development potential of the Park and does not expand options for avoiding and mitigating potential adverse environmental impacts. Therefore, it is not an acceptable option."
- 13) What is even more significant than the discussion above is, from the DSGEIS "The loss of forest and grasslands are considered irreversible ecological impacts. The larger project footprint increases the acreage of land clearance; thus, creating a larger impact on ecological resources."
- 14) Is the reason OCIDA wants to acquire the properties on Burnet Road, the access road itself??? Is that adequate justification? The County spent funding improving the road, so it is now ours, oh, and we want all the properties along Burnet Road....appears to be pre-meditated, prejudicial...how long has OCIDA been planning this land seizure behind closed doors?

The lead agency cannot merely set forth a “conclusory statement, unsupported by empirical or experimental data, scientific authorities or any explanatory information.” *Tehan v. Scrivani*, 97 A.D.2d 769, 771, 468 N.Y.S.2d 402, 406 (2d Dep’t 1983).

NEPA §102(c), 42 U.S.C. §4332(c). A draft EIS must first be circulated for public comment, followed by a final EIS which addresses substantive public comments. §1502.9.

Interested persons may be able to sue in federal district to challenge the adequacy of the NEPA review if it is “arbitrary or capricious,” such as where there is no “reasoned elaboration” to adequately justify a FONSI [Negative Declaration]. *City of Rochester v. U.S. Postal Service*, 541 F.2d 967 (2d Cir. 1976).

### **Home Rule vs. Dillon’s Rule**

In contrast to the Home Rule promulgated system of local government used in New York State, where local communities can exercise authority with local autonomy without state interference, Dillon’s Rule Guards against runaway local Governments. Dillon’s Rule grants state government the power to rein in irresponsible or uncooperative local governments. In fact, John Dillon created the rule in a time when local government corruption ran rampant. This appears to be the case in how OCIDA has handled the White Pine Commerce Park endeavor. The lack of public involvement, the timing and fear tactics used to acquire property, and the undue influence and prejudicial inference on the Draft SEQRA Environmental Impact Statement. It appears that the decisions of a very elite few will impact the lives of so many. Public involvement in a democratic process should be considered, rather than an oligarchy running rough shot over the residents in the area, displaying abuse of authority for personal and political gain of an elite few.

## **Eminent Domain**

Eminent domain is the power of government to take away a person's home or business. A "despotic" power of government, because of the vast potential for abuse of such a serious and drastic power, the 5th Amendment to the U.S. Constitution clearly states that private property shall not be "taken for public use, without just compensation." The use must be public, and just compensation must be paid. If private property could be taken for any use at all, the term "public" would not have been included.

Originally, "public use" was understood by just about everyone—courts, governments and the general public—to have its ordinary meaning. Eminent domain was used only for projects that would be owned by or open to the public, such as roads, public buildings, and, eventually, so-called common carriers, like railroads and public utilities. Courts further explained that the government was limited to taking only that property "necessary" for the public use. It could not simply grab additional land to increase its holdings.

### **New York Consolidated Laws, Eminent Domain Procedure Law - EDP § 101. Purpose**

It is the purpose of this law to provide the exclusive procedure by which property shall be acquired by exercise of the power of eminent domain in New York state; to assure that just compensation shall be paid to those persons whose property rights are acquired by the exercise of the power of eminent domain; to establish opportunity for public participation in the planning of public projects "necessitating" the exercise of eminent domain; to give due regard to the "need to acquire property for public use" (not speculation of public use) as well as the legitimate interests of private property owners, local communities and the quality of the environment, and to that end to promote and facilitate recognition and careful consideration of those interests; to encourage settlement of claims for just compensation and expedite payments to

property owners; to establish rules to reduce litigation, and to ensure equal treatment to all property owners.

In 1954, the U.S. Supreme Court drastically expanded the power of eminent domain. In *Berman v. Parker*, the Court upheld the constitutionality of “urban renewal”—misguided efforts by the federal government and local officials to revitalize urban areas to supposedly remove slums and eliminate blight. The case originated in Southwest Washington, D.C., in a poor area populated largely by minorities. The U.S. Congress granted the District government the ability to acquire tracts of land through eminent domain for the purpose of redevelopment, including the resale of the land to private developers. In this decision, the Court transformed the words “public use” to mean “public purpose” as defined by a legislature or administrative agency. Many state courts followed the Supreme Court’s lead and started to uphold virtually any use of eminent domain, even for private parties. What was once an exception to the Constitution’s public use requirement born in a time of concern about urban decline became a means for governments to take property from one private owner to transfer to another private party for his or her financial gain.

For over half a century, unrestrained local and state governments ran roughshod over the Constitution and took private property for private businesses in the name of “urban renewal” or “economic development.” Private homes and businesses were bulldozed, and entire neighborhoods

### *Kelo v. City of New London*

A little pink house became the center for one of the most controversial decisions in the entire history of the U.S. Supreme Court. When Susette Kelo purchased her pink, two-bedroom house in 1997 along the Thames River—a beautiful stretch of waterfront property in New London, Conn.—she thought she had her work cut out for her just restoring the house and designing the garden. That turned out to be the least of her worries.

Unbeknownst to Susette, the city, the New London Development Corporation (a private development corporation) and Pfizer Corporation had reached an agreement. Pfizer would build a new facility nearby. The NLDC would take all of the land in Susette's neighborhood and transfer it to a private developer. The private developer would in turn build an expensive hotel for Pfizer visitors, expensive condos for Pfizer employees, an office building for biotech companies, and other projects to supposedly complement the Pfizer facility. The state and the city would contribute millions of dollars. The only people standing in the way were Susette and her neighbors.

The case eventually reached the U.S. Supreme Court. In 2005, in a bitterly contested 5-4 ruling, the Court held that economic development was a "public use" under the Fifth Amendment to the U.S. Constitution.

After the decision, the remaining residents who had fought to save their homes, including Susette, were forced out. The Fort Trumbull site was completely razed. And it has remained empty ever since—brown, barren fields no longer home to people but rather to feral cats and migratory birds.

In 2009, Pfizer announced that it would close its research and development headquarters and leave New London. The disastrous Fort Trumbull project is now Exhibit A in demonstrating the folly of government plans that involve corporate welfare and that abuse eminent domain for private development. Hopefully, city officials, planners and developers across the country will take the Fort Trumbull experience to heart and pursue revitalization efforts only through voluntary—not coercive—means.

Unfortunately, just as Justice O'Connor had predicted, the Supreme Court's judicial abdication ushered in a new wave of eminent domain abuse nationwide.

As a result, 44 states tightened their eminent domain laws, and 12 states amended their constitutions to ban eminent domain for private gain and to provide for more protections for property owners.

The *Kelo v. City of New London* eminent domain decision of the United States Supreme Court on June 23, 2005 allows municipalities to take land from private individuals and sell it to developers who promise economic development (jobs and tax revenue) for the city. The power for such decisions rests in the hands of a few elites and not the citizens themselves. In a *Newsday* poll, 93.7 percent of Americans polled disagreed with the decision.

This is a clear example of oligarchy subverting democracy. The relationship between democracy and oligarchy was classically discussed by Aristotle, who wrote that "There are, broadly speaking, two kinds of constitutions, 'that of the people' and 'that of the few', democracy and oligarchy."

At the Constitutional Convention, Benjamin Franklin even suggested that the Senate, like the Roman Senate, should represent the interests of the wealthy class, while the House represent the interests of the people. This would ensure that legislation would not be passed unless it truly served the interests of all.

The body of Supreme Court decisions, considered to be constitutional law, has, over time, reversed the founder's desire to make protection of private property one of the pillars of government and instead allows the concept of "public good" as defined by elites to trump individual property rights.

The Founders would be appalled to see what we have done to property rights over the course of the 20th century. One would never know today that their status in the Bill of Rights was equal to that of any other right. The time has come to restore respect for these most basic of rights, the foundation of all of our rights.

Explicit in the Just Compensation Clause is the requirement that the taking of private property be for a public use; one cannot be deprived of his property for any reason other than a public use, even with compensation.

A vigorous four-justice dissent countered that localities will always be able to manufacture a plausible public purpose, so that the majority opinion leaves the vast majority of private parcels subject to condemnation when a higher-valued use is desired.

### **Questions Related to Eminent Domain**

- 1) Is it OCIDA's intent to utilize Eminent Domain Procedure Law (EDPL) to acquire the entirety of the properties on either side of Burnet Road and the Nazarene church, regardless of if they have a corporation signed to purchase the property or not?...Is it the intent of OCIDA to use EDPL to acquire the all the aforementioned properties simply to enable OCIDA to advertise and market the larger property foot print?
- 2) If it's a smaller corporation, that needs a smaller footprint, is it still OCIDA's intent to utilize EDPL on the entirety of the properties on either side Burnet Road and the Nazarene church?....Or could some property be allowed to remain and keep their residences on Burnet Road?
- 3) Is OCIDA required to have an approved Final GEIS, an approved SEQRA, all the approved required environmental permits mentioned in the DSGEIS, and have an approved project with a corporation signed to purchase the property, in order to proceed with Eminent Domain Procedure Law and start acquiring the properties?



4) What is the minimum requirement and timeline necessary for OCIDA to proceed with EDPL?

The residents of Burnet Road want to understand the details, the process and the timeline, and they deserve answers so they can make informed decisions.

“No agency involved in an action may undertake, fund or approve the action until it has complied with the provisions of SEQRA.” 6 N.Y.C.R.R. § 617.3(a). The “purpose of SEQRA is to assure the preparation and availability of an environmental impact statement at the time any significant authorization is granted for a specific proposal.” *Tri-County Taxpayers Assoc. v. Town Board of Queensbury*, 55 N.Y.2d 41, 46-7, 447 N.Y.S.2d 699, 701 (1982). That way, “a decision maker [will] balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve the project.” *Town of Henrietta v. DEC*, 76 A.D.2d 215, 430 N.Y.S.2d 440, 447 (4th Dep’t 1980); *Briody v. Village of Lewiston*, 188 A.D.2d 1017, 591 N.Y.S.2d 1017 (4th Dep’t 1992).

“[C]ompliance with SEQRA must occur before the agency acts; after-the-fact compliance is of no avail.” *DiVeronica v. Arsenault*, 124 A.D.2d 442, 507 N.Y.S.2d 541, 543 (3d Dep’t 1986). Thus, before an agency can make a “significant authorization” for an “action,” it must have before it either an accepted FEIS and findings, or else a valid negative declaration that the proposal will not have a significant environmental impact. *Devitt v. Heimbach*, 58 N.Y.2d 925, 460 N.Y.S.2d 512 (1983). Otherwise, the action is invalid. *Tri-County Taxpayers Assoc. v. Town Board of Queensbury*, 55 N.Y.2d 41, 447 N.Y.S.2d 699 (1982); *Briody v. Village of Lewiston*, 188 A.D.2d 1017, 591 N.Y.S.2d 1017 (4th Dep’t 1992), app. den’d 81 N.Y.2d 710, 600 N.Y.S.2d 197 (1993).



11 June 2021

Robert M. Petrovich  
Executive Director  
Onondaga County Industrial Development Agency  
333 W. Washington Street, Suite 130  
Syracuse, New York 13202

RE: Comments, Draft Supplemental Generic Environmental Impact Statement (DSGEIS), Volume 1:  
White Pine Commerce Park, 5171 Route 31, Town of Clay

Dear Mr. Petrovich,

CDE Engineering and Environment, PLLC (CDE) has been retained by residents of Burnett Road in the Town of Clay to review and provide comments on the above referenced document. CDE's review was focused solely on Volume 1 of the DSGEIS and did not review of Volume 2 or other previously State Environmental Quality Review (SEQR) documentation. Specifically, CDE's review:

1. Focused on adherence of the document to New York State Environmental Conservation Law, Article 8 Environmental Quality Review, Env § 8-0105 thru Env § 8-0109 and 6 NYCRR Part 617.10 for completeness of the document.
2. Adequacy in the discussion of environmental impacts and mitigation of those impacts.

In general, CDE's review found the document to be complete, the discussions thorough, and mitigations appropriate. The document discussed all applicable local, state, and federal regulations for the project, recommended mitigation strategies that will protect the existing flora and fauna of the site, and provide protections for wetlands, surface waters, soil, and air. In addressing air, water, soil, flora and fauna, the document met those requirements.

The document, however, failed to follow the definition of environment as per Article 8 Environmental Quality Review, Env § 8-0105:

***6. "Environment" means the physical conditions which will be affected by a proposed action, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance, existing patterns of population concentration, distribution, or growth, and existing community or neighborhood character.***



The document discussed or referenced in numerous locations economic or financial concerns that are not included in the definition of “environment” and thus have no bearing on the discussion of alternatives in Chapter 2 or elsewhere in the document.

The document did not adequately address the “existing community or neighborhood character” for those homes and establishments that will be displaced by the proposed action. The document did not present any demographic data to include age, time in home, income level or other relevant factors when determining the impact of relocation.

Mitigation measures are taken almost verbatim from the Eminent Domain Procedure Law and only address normal costs associated with real estate transactions; the mitigation measures do not address other considerations associated with relocation such as:

1. public private school calendars.
2. house hunting expenses (if any).
3. temporary lodging between vacating the condemned house and moving into a new house or residence.
4. household good storage.
5. moving expenses.
6. minor repairs/aesthetic changes to newly purchased property.
7. buyer’s closing costs to include realtors’ fees and down payments.

Attached is a commented version of the DSGEIS for your review.

Thank you for your attention to this matter.

A handwritten signature in black ink, appearing to read "D. Roote", is positioned to the left of the official seal.



11 June 2021

Dennis R. Roote, P.E.  
President

Enc: Draft Supplemental Generic Environmental Impact Statement (DSGEIS), Volume 1: White Pine Commerce Park, 5171 Route 31, Town of Clay – Commented.

Cc: Michelle Nuzzo  
Neil Gingold

NEW YORK STATE ENVIRONMENTAL QUALITY REVIEW ACT (SEQRA)  
**DRAFT SUPPLEMENTAL GENERIC ENVIRONMENTAL IMPACT  
STATEMENT**

# **VOLUME I:**

## **WHITE PINE COMMERCE PARK**

5171 Route 31 Town of Clay, NY 13041

### **Lead Agency: Onondaga County Industrial Development Agency**

<https://www.ongoved.com>

Robert M. Petrovich, Executive Director

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### **Prepared by:**

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19 British American Boulevard

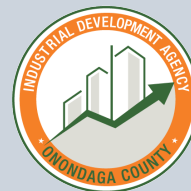
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518-782-0882

**May 2021**

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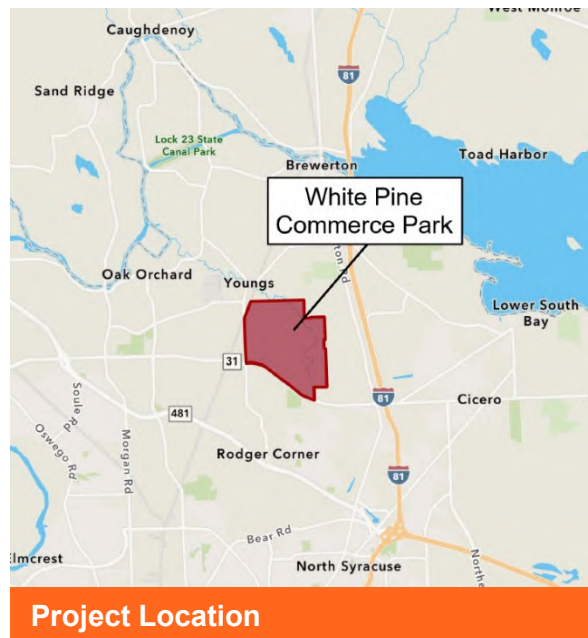
## EXECUTIVE SUMMARY

### Project Background

#### *Project Location and Description*

The Onondaga County Industrial Development Agency (“OCIDA”) proposes to expand its modern industrial park at the White Pine Commerce Park (“Park”), formerly known as the Clay Business Park. The Park is located northeast of the intersection of NYS Route 31 and Caughdenoy Road in the Town of Clay, Onondaga County, New York. The Park is approximately 7 miles north of the City of Syracuse.

The Park was created to be capable of supporting a mix of industrial and/or commercial uses with related office space, advanced state-of-the-art research, large- or small-scale manufacturing, assembly, warehousing, data management, material processing and distribution facilities in a campus-like setting.



OCIDA has devoted substantial time and effort into developing the Park, with a particular focus on development that will bring high-tech facilities and high paying jobs to Onondaga County. More recently OCIDA has focused its efforts on the semiconductor industry. These efforts have been unsuccessful to date as it has become apparent that a larger geographic footprint is necessary in order to support this type of industry and associated investment required by the tenants.

OCIDA, as Project Sponsor, proposes to expand the Park to approximately 1,250± acres (the “Project” or “Action”). OCIDA currently owns approximately 648± acres, has another 282± acres under contract, and would acquire approximately 320± additional acres. The acreage to be acquired are parcels contiguous to the current Park, and are generally located along Route 31, and along the east and west sides of Burnet Road. OCIDA would acquire the additional parcels through purchase agreements with existing landowners or, if necessary, pursuant to the Eminent Domain Procedure Law (“EDPL”), to avoid fragmented parcels that would hinder future development.

#### *Project Overview and History*

This Draft Supplemental Generic Environmental Impact Statement (“Draft SGEIS”) is a supplement to the 2013 Final Generic Environmental Impact Statement that was completed (“2013 FGEIS”) and OCIDA’s issuance of a Findings Statement that concluded that development of the then existing 340±-acre Park avoided or minimized adverse environmental impacts to the maximum extent practicable, and incorporated mitigation measures that were considered practicable.





### ***Project Purpose and Need***

The Project purpose is to expand the Park to enable OCIDA to market the Park to a larger, more diverse mix of potential industrial and commercial developers by making the Project site more attractive to a broader scope of industries, particularly the semiconductor industry, and bringing high tech and high paying jobs to Onondaga County.

This Draft SGEIS identifies, evaluates, and addresses various impact thresholds, permit criteria, and mitigation measures anticipated for the expanded Park, including those attributes associated with large-scale semiconductor industrial development. By addressing these issues in a Generic EIS format, the SEQRA process will define a set of threshold conditions or criteria under which potential future actions and development will be undertaken or approved, including any subsequent SEQRA compliance requirements.

### ***Proposed Development***

The 2013 FGEIS detailed a preferred development scenario, which anticipated a full build-out of approximately 2.0 to 2.5 million square feet of industrial development and assumed that the Project would be developed in several phases. Given the lack of any specific tenant and uncertain timing for development of future phases, this Draft SGEIS considers the potential impacts associated with the development of the Park, including the expanded area, while providing for further evaluation, as necessary, when a conceptual plan for a specific development is available.

The development evaluated in this Draft SGEIS contemplates OCIDA's focus on developing the Park with a tenant or tenants in the semiconductor industry. This may translate into a buildout encompassing approximately 4.0 million square feet of industrial development at the Park. This would equate to approximately 400 acres of surface disturbance (temporary and permanent) within the Park developed in a campus like setting that would be sited to avoid regulated wetland areas and would limit the height of structures to no more than 160 feet. This anticipated development is expected to bring approximately 4,000 jobs covering three shifts that operate 24/7 year-round.

Based on a review of similar types of facilities being developed in other areas of the country, and given existing site conditions and the Project purpose, the initial buildout would likely include the following:

- A combined total of approximately 4.0 million square feet (SF) of buildings in a campus like setting made up of the type of uses identified in the 2013 FGEIS (manufacturing, laboratory, R&D, fabrication, warehousing, office, support, utility, waste, service yards, energy, water treatment)
- Approximately 50 acres of paved area for parking (which may include parking garages), loading, internal road circulation and/or shipping/receiving areas
- Two (2) access roads enter the Project site from NYS Route 31 and Caughdenoy Road)
- Approximately seven miles of new sanitary sewer line from the Oak Orchard WWTP to service the surrounding sewer district, including the Park
- Approximately four miles of new gas line to the Park
- Approximately 5,000 linear feet of underground electric line to the Park



- Areas avoided and set aside for wetland preservation, conservation, and if necessary, mitigation
- Additional areas for:
  - Stormwater management
  - Truck scales and security guard stations
  - Fuel storage
  - Employee amenities, trails and open space
  - Landscaping, security fencing, signage, earthen berms and vegetated buffers

Project development will include site infrastructure including internal roads, drainage culverts, waterlines, sewer and wastewater systems, electric, natural gas, stormwater management systems, lighting, landscaped areas, earthen berms and areas maintained as undeveloped natural buffers. It is anticipated that areas owned by OCIDA that are north of existing New York Power Authority and National Grid transmission lines will not be developed to avoid actual or potential wetland areas. Upland areas alongside these wetlands may be suitable as possible wetland mitigation areas, if necessary, for potential impacts that cannot be avoided or minimized by a future specific development, which is not covered by this Draft SGEIS.

The development of the Park will likely begin south of the NYPA/National Grid transmission lines to avoid potential wetlands and state wetland adjacent areas to the maximum extent practicable, which are situated in the eastern portion of the Project site. This area includes approximately 732± total acres of prime developable land within the Park. See Figure 1.1-2. This area has been identified as the prime developable area due to the anticipated absence of wetlands features, the generally flat topography, and the access to the surrounding transportation network and potential access points along NYS Route 31 and Caughdenoy Road. The prime developable area within the Project site is also positioned away from the overhead transmission lines, which run across the northern portion of the Project site. The proposed gas line and sewer connection would also tie directly into this portion of the Project site with limited impacts, if any, to wetlands or other natural features anticipated.

## Changes in Circumstances

The 2013 FGEIS envisioned a Park that would accommodate a mix of industrial uses which could include office, research, manufacturing, assembly, warehousing and distribution facilities in a campus environment. It similarly noted OCIDA's intent to market the Park "for various types of uses possibly including advanced manufacturing, material processing, product assembly, warehouse and distribution, research and development, and data management to facilitate the creation of high-paying employment opportunities in Onondaga County." (FGEIS Section 1.2).

OCIDA now seeks to market the Project to a larger, more diverse mix of potential industrial and commercial developers by making the Project site more attractive to a broader scope of industries. The expanded Park will be capable of supporting a mix of industrial and/or commercial uses with related office space, advanced state-of-the-art research, large- or small-scale manufacturing, assembly, warehousing, data management, material processing and distribution facilities in a campus-like setting. As such, OCIDA intends to market the Project site in a more targeted manner to the semiconductor industry. OCIDA would acquire the additional parcels through purchase agreements with existing





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"prime developable land" used in this context seems does not address impacts on other physical conditions such as "existing patterns of population concentration, distribution, or growth, and existing community or neighborhood character"

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landowners or, if necessary, pursuant to the EDPL, to avoid fragmented parcels that would hinder future development.

Since the completion of 2013 FGEIS, the Climate Leadership and Community Protection Act (CLCPA) was passed and signed into law in 2019 (Chapter 106 of the Laws of 2019). The CLCPA and Environmental Conservation Law (“ECL”) Article 75 require NYSDEC to promulgate regulations to establish a statewide greenhouse gas (“GHG”) emissions limit for 2030 that is sixty percent of 1990 GHG emissions, and for 2050 that is fifteen percent of 1990 GHG emissions. The CLCPA also requires the Public Service Commission (“PSC”) to establish a program to meet a target of seventy percent of statewide electrical generation from renewable sources by 2030, and a target of zero GHG emissions for statewide electrical demand by 2040. NYSDEC adopted 6 NYCRR Part 496 on December 30, 2020, which established the statewide GHG emission limits for 2030 and 2050 consistent with ECL Article 75 and the CLCPA. On October 15, 2020, the PSC issued an Order expanding the Clean Energy Standard to increase renewable energy in the state to 70% by 2030. In addition to the regulations, Section 7(2) of the CLCPA requires all state agencies to consider whether the decision to issue permit(s) is inconsistent with or will interfere with the attainment of the ECL Article 75 GHG emission limits.

## Alternatives

Several alternatives were fully evaluated in the 2013 FGEIS. This Draft SGEIS updates those that have changed since that time and expands upon others as necessary to account for the proposed expansion of the Park. These alternatives include: no action (Alternative 1); considering the Park as it was originally proposed in the 2013 FGEIS (Alternative 2); utilizing a smaller expanded area – less than the approximately 1,250± acres (Alternative 3); and considering a different location to site the Park (Alternative 4).

### *Alternative 1*

The no action alternative would result in the Park remaining open space and potential habitat for common wildlife that is inaccessible and unutilized by the community until it is sold for other purposes. This alternative would avoid the potential need for to acquire lands pursuant to the Eminent Domain Procedure Law (EDPL) to further expand the lands owned by OCIDA to support future development. See 2013 FGEIS (Draft Section 2.1) for further analysis of this alternative.

The no action alternative would adversely affect Onondaga County’s ability to remain competitive in attracting large-scale industries to Central New York. The no action alternative would preclude potentially **beneficial economic impacts** associated with the Project, including an increase in employment opportunities and enhanced tax revenues.

Also, current investment in the site may be lost with this alternative, as site conditions change over time. This could decrease the future development potential of the site due to increased costs associated with vegetation clearing and changing drainage characteristics, which may affect the use of additional acreage. The completed technical studies would also be less useful as data and recommendations become increasingly outdated.





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This statement refers to economic impacts, which are not in the definition of "environment" as

Ultimately, the no action alternative is not an acceptable alternative to the Project, as it is contrary to OCIDA's mission to facilitate industrial development and job creation in Onondaga County.

### *Alternative 2*

Alternative 2 would keep the size of the Park to 340± acres, which is roughly 911± acres smaller than the currently proposed 1,250± acre expanded Project site. Although potential environmental impacts would be limited to a smaller area, impacts on certain resources, such as wildlife may potentially be greater, as sectional development could significantly fragment essential wildlife habitat. The main wildlife mitigation for the Park is to retain/maintain existing habitat tracts, and when not feasible, use compensatory mitigation to include creation or enhanced restoration of habitat to account for any habitat loss. With a smaller park size, it would be difficult to achieve both objectives, including on-site compensatory mitigation due to space limitations. This alternative would avoid the potential need to acquire lands pursuant to EDPL to further expand the lands owned by OCIDA to support future development. A smaller sized Park may not reduce certain environmental impacts such as traffic, visual, air and noise. Instead, it could just reduce the size of open greenspace incorporated into any development design and cause greater wetlands disturbance.

OCIDA has marketed the existing approximately 340±-acre Park since 2013 and determined that the current Park is too small for the type of development it desires to attract to the area and consistent with other industrial park developments in other areas of New York and the country. The smaller, approximate 340± acre footprint would not allow for the potential of larger industrial and commercial developers, such as the semiconductor industry. The proposed expanded footprint of the Park allows OCIDA to market to a larger, more diverse mix of industries than it had previously. The smaller sized Park would not support the main objective, which is to attract a broader scope of industries such as the semiconductor industry, which require a large campus setting with greenspace and ample buffering from environmental receptors and would bring high tech and high paying jobs to Onondaga County.

Although Alternative 2 would avoid the potential need to acquire lands, if necessary, pursuant to the EDPL, it is not a viable option as it would greatly limit the full economic and development potential of the Project site in terms of viable tenants, occupancy and use, and limit options for avoiding and mitigating potential adverse environmental impacts.

### *Alternative 3*

Alternative 3, a smaller expansion alternative, would allow for development on only a portion of the Project site, potentially keeping the remainder of the site in its current state, as vacant, undeveloped land or residential homes, and could reduce, or potentially avoid, the potential need to use EDPL to acquire lands. The smaller expansion alternative would have similar environmental impacts as Alternative 2 (The Park as Considered in the 2013 FGEIS) as well as those described in this Draft SGEIS for the Project. As explained above, the potential for habitat fragmentation on the smaller scale project could potentially cause greater impacts to wildlife. Site development would create additional vehicle traffic in the immediate vicinity and would change the visual character, aesthetics, air and noise quality, vegetation and habitats on-site, regardless of the smaller footprint. It also has the potential to reduce the size of open



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This statement addresses economic impact

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This statement addresses economic impact

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greenspace incorporated into any development design and potentially cause greater wetlands disturbance. The smaller footprint could result in development located closer to residential locations that are not acquired by OCIDA, thus creating greater potential environmental impacts. In contrast, the preferred alternative would allow future tenants additional acreage on-site sufficient to construct necessary buildings and accessory uses, buffer development from adjacent lands, and avoid impacts to ecological resources such as wetlands to the maximum extent practicable.

Although this alternative considers the idea of potentially maximizing development space within a smaller area, much like Alternative 2, the smaller footprint would not allow for the potential of larger industrial and commercial developers, such as the semiconductor industry. The proposed expanded footprint of the Park allows OCIDA to market to a larger, more diverse mix of industries than it had previously. The smaller sized park would not support the main objective, which is to attract a broader scope of industries such as the semiconductor industry that require large campus type settings with greenspace and ample buffering from environmental receptors and would bring high tech and high paying jobs to Onondaga County.

Like Alternative 2, the smaller expansion alternative does not maximize the development potential of the Park and does not expand options for avoiding and mitigating potential adverse environmental impacts. Therefore, it is not an acceptable option.

#### *Alternative 4*

Alternative 4 would consist of the development of the proposed Project at a different location. This alternative was previously evaluated and rejected in the 2013 FGEIS (Draft Section 2.2.1). Based on current available information, this conclusion has not changed. None of these previously considered alternative locations would be able to accommodate the large-scale industrial use the Park is promoting due to size limitations and proximity to services and necessary infrastructure. There are no other options available currently that meet the needs of the Project.

Unlike other park locations, the expanded Park can accommodate large-scale industrial tenants that cannot easily locate elsewhere in Onondaga County due to their size and space requirements and need for suitable infrastructure. Additionally, the other locations do not have the existing utility and transportation services that serve the Park. National Grid's Clay Substation is located adjacent to the Park on the west side of Caughdenoy Road. The Oak Orchard Wastewater Treatment Plant is located approximately 2.5 miles west of the Park. The Park is also bound to the south by a 12-inch water line and NYS Route 31, which is a principal arterial west of Interstate-81, and CSX rail, which is located adjacent to the Park.

Based on the lack of other viable locations within the County to accommodate the intended scale of the Park, as well as OCIDA's substantial investment in the Park to date, this alternative is not a viable option.







This statement addresses economic impact

## Existing Conditions, Impacts and Mitigation

### *Land Use and Zoning*

The proposed expanded Park footprint consists primarily of undeveloped land. To the extent development exists, it is limited to residential, commercial, and public utility uses and structures (i.e., electric transmission lines, telecommunications tower) scattered along NYS Route 31 and Caughdenoy Road, with approximately three dozen residences located along Burnet Road. Existing improvements and structures within the expanded Park footprint are located close to existing road frontages, leaving the remainder of the expanded Park in its natural, undeveloped state. The majority of the Park is relatively flat and vegetated with grasses, shrub, and wooded areas that have developed as the area continues to transition from former farmland. Land uses within the proposed expanded Park have remained consistent since the 2013 FGEIS.

The area surrounding the Park was once a rural area comprised of farmland and agricultural uses. The surrounding area is undergoing gradual changes as a more suburban type of development unfolds, primarily along NYS Route 31, but much of the area closest to the Park has maintained a rural character due to large swaths of undeveloped land. While farming activities are conducted within a small portion of the proposed expanded Park, the Park is not located within or near a NYS certified agricultural district.

The proposed expanded Park is located within the Town of Clay and is subject to the zoning requirements contained in the Town's Zoning Code and the zoning district designations contained in the Town's Zoning Map.<sup>1</sup> Of the proposed expanded Park's approximately 1,250± acres, 346± acres are zoned as Industrial 2 (I-2), 856± acres are zoned Residential Agricultural (RA-100), and 36± acres are zoned One Family Residential (R-15). Burnet Road comprises the remaining 12 ± acres that make up the expanded Park. As shown in Figure 3.1-2 (located at the end of Chapter 3), approximately 850± acres of privately owned land located on Caughdenoy Road west and north of the Park is zoned I-2, with additional parcels zoned RA-100. The parcels directly south of the Park along NYS Route 31 are zoned Highway Commercial (HC-1) and RA-100. The parcel located adjacent to the southeastern corner of the Park is zoned Planned Development (PDD). The proposed expanded Park's eastern property line is the boundary between the towns of Clay and Cicero. The proposed expanded Park contains multiple zoning designations, not all of which are compatible with the intended future use and development of the Park. The expanded Park will therefore require the approval by the Town of Clay Town Board of either a zone change to I-2 for the portions of the Park that are not zoned I-2 or a PDD that encompasses the entire Park footprint to allow the type of use OCIDA seeks for the Park.

### *Community Character*

The Town of Clay is still the largest suburban town in Onondaga County. The Town has a diverse economic base, and industrial uses are scattered throughout the Town, including a developed industrial corridor between Henry Clay Boulevard and Morgan Road approximately 5 miles southwest of the Park. The population of the Town along with its pace of development has remained mostly unchanged since the

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<sup>1</sup> Town of Clay Zoning Code (Last Revised May 10, 2016). <https://www.townofclay.org/information/zoning-code>.



2013 FGEIS. The character of the area immediately surrounding the Park remains generally rural in contrast to the more developed areas of the Town of Clay and nearby Town of Cicero.

NYS Route 31 represents the primary east-west traffic corridor in the Town of Clay north of I-481 and carries a high volume of traffic between Clay and Cicero. Nearly all travel in the vicinity of the project site is by personal vehicle, which remains unchanged since the 2013 FGEIS. There is little public transit and pedestrian use along major roadways, including NYS Route 31, and the area immediately surrounding the proposed expanded Park lacks sidewalks or other pedestrian facilities (crosswalks, etc.) that would otherwise encourage pedestrian use. While NYS Route 31 is a designated part of New York State Bike Route 5, bicycling activity is not typical along the road or surrounding area. The CSX rail line that provides freight service crosses NYS Route 31 southwest of the Park.

Visually, the western portion of the expanded Park contains few structures or natural features of any significance. The topography of the area is generally flat, which is typical of the Town of Clay and the northern portion of Onondaga County. Undeveloped areas contain mixed upland and wetland vegetation including grasses, shrubs, and woodlands. These resources are described in detail later in this chapter under existing ecology and vegetation. The area of the expanded Park that includes Burnet Road contains approximately three dozen residential properties that have been or will be acquired by OCIDA through voluntary purchase agreements or pursuant to the EDPL to help establish the expanded Park footprint. These residential properties will be rezoned to support the proposed development of the Park and existing structures removed from the property.

Electrical utilities, including the National Grid electrical substation located just west of the Park and the NYPA and National Grid transmission lines passing through the northern third of the site are prominent visual features in the area. A telecommunications tower also exists within the expanded Park adjacent to the southeastern corner of the current Park footprint. The presence of these public utility structures and uses incorporates an industrial element to the otherwise undeveloped character of the area.

Existing development in the area surrounding the existing Park is either low density single-family suburban style housing or older style rural homes and former farmland. A few business and commercial uses exist along Caughdenoy Road and NYS Route 31 west and south of the Park. With the exception of the area extending north of the Park for several miles that remains largely rural and undeveloped or sparsely developed, surrounding areas in other directions become more densely developed farther away from the Park. Areas east of site along NYS Route 31 and Brewerton Road in the Town of Cicero contain dense concentrations of business and commercial development with residential development interspersed throughout. Higher-density residential and commercial development along the NYS Route 31 corridor within the Town of Clay occurs mostly to the south and southeast of the Park along Stearns Road and Caughdenoy Road north of I-481. Areas farther west of site transition from suburban residential into a developed, high-traffic shopping area along NYS Route 31 around the I-481 interchange. The development of retail, commercial and residential growth farther away from the Park in both directions along NYS Route 31 in Clay and Cicero is due in large part to the proximity of NYS Route 31 to I-81, I-481, I-90 and the Syracuse Hancock International Airport. Together, those features have made the greater surrounding area attractive to many forms of development.





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This will require SEQR review through the Town of Clay

To avoid or minimize potential adverse impacts to the extent practicable, the potential future development of the expanded Park will occur subject to the design features, conditions, and mitigation measures required by the Town of Clay Town and Planning Boards in accordance with the requirements of the Zoning Code. In conjunction with either a zone change or PDD approval process, OCIDA will work with the Town Board and/or Planning Board to identify specific issues or areas of concern and develop specific measures to address or alleviate such concerns to ensure the objectives of the Project are achieved while also minimizing or mitigating development related impacts on the surrounding community.

Undeveloped portions of the Park will likely be maintained as wetlands, vegetated greenspace and integrated into stormwater management and other site design features. Additionally, greenspace would be used to meet setback requirements or other design thresholds that may be included in a PDD or site plan. Greenspace may also be incorporated in the tenant facility design/layouts to serve aesthetic purposes, establishing a campus-like setting for tenant employees and visitors.

With respect to the acquisition and removal of residential properties to enable the creation and future development of the expanded Park, OCIDA will negotiate to purchase these properties at fair market value and pay the seller's normal transaction costs of updating the title and survey, recording fees, transfer taxes and other similar expenses in connection with the transfer of these properties as well as the pro rata portion of real property taxes, water rents, sewer rents, special ad valorem charges and other similar charges. In the event it is necessary to acquire any such properties pursuant to the EDPL, as condemnor OCIDA will offer just compensation based on the fair market value determined by its highest approved appraisal, and the respective property owners will have the right to challenge the amount of such just compensation under EDPL Article 5. OCIDA will also pay, upon acquisition, any costs associated with recording fees, transfer taxes, penalties incurred by the condemnee for prepayment of any preexisting recorded mortgage entered into in good faith encumbering the property, and the pro rata portion of real property taxes, water rents, sewer rents, special ad valorem taxes and other similar charges.

### ***Transportation***

An increase in traffic will result from construction and development of the Park. Traffic is also projected to increase from other developments occurring in the area and will change the existing levels of service (LOS) at certain intersections along NYS Route 31. Therefore, roadway improvements along NYS Route 31 are proposed based on existing and future traffic volumes. Regardless of development at the Park, transportation improvements will be required along NYS Route 31 as other development occurs over time.

Since the preparation of the 2012 Traffic Impact Study that was part of the 2012 DGEIS and finalized in the 2013 FGEIS, traffic roadway changes include:

- The addition of exclusive eastbound and westbound left turn lanes along NYS Route 31 at Henry Clay Boulevard;
- The unsignalized intersections of NYS Route 31/Caughdenoy Road and NYS Route 31/Legionnaire Drive/Lawton Road were signalized;





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Does not address potential SEQR action

- The Caughdenoy Road/NYS Route 31 intersection was also recommended for right and left turn lane additions; however, the current development assumptions have changed with multiple site entrances.

Impacts related to the proposed expanded Park are described in Section 4.3.

A new Traffic Impact Study (TIS) was prepared to evaluate potential traffic impacts associated with the proposed expanded Park area. Due to the generic nature of this review, the TIS includes more generic as opposed to specific development details and follows the assumptions to develop the traffic impact of the proposed expansion and potential development, which include supporting between 3,750 to 4,000 employees (4,000 used for analysis), having a minimum of two driveways for site access: one driveway will be connected to Caughdenoy Road and the other will be connected to NYS Route 31; operating 24 hours a day and seven days a week with three equally sized rotating working shifts; and development of the Project site will be completed and operational by the year 2024.

Capacity analysis was performed, and the following capacity improvement measures are recommended to address LOS, travel speeds, delay, and safety:

- NYS Route 31 at Henry Clay Boulevard: Construct a northbound left turn lane,
- NYS Route 31 at US Route 11: Construct an additional left turn lane to provide for westbound dual left turn lanes and modify left turn phasing from permissive/protected to protected,
- NYS Route 31 at I-81 Southbound Ramps: Construct an additional left turn lane to provide westbound double left turn lanes and change westbound left turn phasing from permissive/protected to protected and widen to two lanes on the on-ramp before merging to a single lane prior to the merge on to I-81.
- NYS Route 31 at I-81 Northbound/ Pardee Road: On I-81 northbound off ramp construct an additional left and right turn lane.
- NYS Route 31 at Site Entrance 2: An addition of a left turn lane along NYS Route 31 eastbound and a right turn lane along NYS Route 31 at the site entrance. A left and right turn will be provided out of the site. A traffic signal is recommended at the intersection.
- Caughdenoy Road at Site Entrance 1: A right and left turn lane will be provided from the site entrance and along Caughdenoy Road.
- NYS Route 31 at Lakeshore Road: Concepts have been developed and coordination will take place with NYSDOT for future consideration.

Additional information is provided in the TIS in Appendix B.

### ***Utilities & Community Services***

Existing and proposed utilities (electric, natural gas, and water) in the vicinity of the Park are shown in Figure 3.4-1. Sewer service is in the process of being extended to the surrounding district, including the Park. Gas utility improvements are being proposed in conjunction with the Park expansion. There have



been no significant changes since 2013 in the location of existing electric, natural gas, and water utilities in the vicinity of the Park.

Community services in the vicinity of the Park include fire, police and emergency response, parks and recreation, schools and other community services such as places of worship. These services remain largely unchanged from 2013. Community service provider locations near the project site are shown in Figure 3.4-2. The area is served by the Clay Fire Department, North Area Volunteer Ambulance Corps (NAVAC), and Northern Onondaga Volunteer Ambulance (NOVA). The Park is in the North Syracuse Central School District which has an enrollment of approximately 8,500 pupils in 2020. The inventory of places of worship in the vicinity of the park is largely unchanged since the 2013 FGEIS was prepared. At least one new church affiliated building, the Upstate New York District Church of the Nazarene, has been built immediately east of the intersection of NYS Route 31 and Burnet Road. The Church uses this location as its main offices for the Nazarene District.

Updated estimates of the potential demands for electric, gas and water supplies, and estimates of sanitary waste volumes have been developed based on the types of industry OCIDA is seeking to attract to the proposed expanded Park:

- Power – up to 500 megavolt-amperes (MVA)
- Water – 5 million gallons per day (MGD)
- Wastewater – 4 MGD
- Natural Gas – up to 7000 meters cubed per hour (m<sup>3</sup>/hr)

OCIDA anticipates that these capacities are adequate to accommodate high technology industries including, but not limited to, semiconductor and semiconductor manufacturing.

Correspondence from National Grid (March 18, 2021, see Appendix C) indicated the existing transmission infrastructure can presently provide up to 540 MVA to the Park, and up to 1,200 MVA is possible in the long term. The estimated Project demand of 500 MVA is within the levels that National Grid has indicated can be provided. No mitigation would be required. No mitigation would be required for fiber optic and phone service which typically expand to meet local demands.

Correspondence from National Grid (March 18, 2021, see Appendix C) indicated that with the extension of the gas main from Gas Regulator Station #147 to the Project site, up to 750 dekatherms per hour (dth/hr) can presently be provided to the Project site with projected future availability of 1,000 dth/hr. The estimated demand of 7,000 m<sup>3</sup>/hr, equivalent to 245 dth/hr, for potential Park users is within the levels that National Grid has indicated can be provided. No mitigation would be required.

Two routes have been considered to connect the Park to the Gas Regulator Station, a proposed route and an alternative route. See Figure 3.4-1. The location of the proposed route lies within previously disturbed public and utility rights-of-way over much of the length of the proposed route. The alternative route makes use of public rights-of-way for the entire length of the route, but is longer than the proposed route.

Permanent and temporary easements would be required along either route. Installation of new gas mains will involve temporary construction impacts along the route. Impacts may include ambient noise, soil





disturbance, and interruption of traffic at construction access points. These temporary impacts will be mitigated through proper construction and best management practices. Trenching, boring and horizontal directional drilling will be utilized to minimize disruption of traffic during construction and to minimize impacts to any wetlands that may be delineated along the route of the proposed gas line. Best management construction practices will be used, including, soil and erosion control and stormwater management. Disturbed areas will be re-graded and reseeded to pre-construction conditions.

Since the proposed route is shorter than the alternative route, construction along the proposed route would result in fewer impacts and it is therefore preferred as the proposed route over the alternative route.

According to April 29, 2021 correspondence from OCWEP, the capacity for up to 4.0 MGD is currently available at the Oak Orchard WWTP. The estimated sanitary sewer discharges from potential development of the expanded Park of 4.0 MGD are within the levels that OCWEP has indicated they can accommodate. No mitigation is required. Further OCWEP had previously commenced the design of the conveyance infrastructure to serve lands within the surrounding district and future development areas. OCWEP estimates that conveyance infrastructure will be available within 24 months.

Industrial wastewater pre-treatment may be required on-site by the OCWEP prior to discharge to the Oak Orchard WWTP, if the wastewater strength from the expanded Park exceeds the limits established for discharge to the municipal sanitary sewer system.

The conveyance infrastructure to support developments in the surrounding district including the Park will consist of six-inch and 12-inch diameter PVC force mains. These lines will be located along Caughdenoy Road and in the existing 99-foot wide Metropolitan Water Board easement that parallels NYS Route 31, and the County's easement that contains the Davis Road Force Main and the Clay – Cicero Force Main to the Oak Orchard WWTP. Installation of new sewer lines will require temporary construction from existing rights-of-way in the area. These temporary impacts will be mitigated through proper construction and best management practices.

Since the majority of the proposed sewer route follows existing MWB and OCWEP easements, the need to procure permanent easements along this route is practically non-existent. However, temporary construction easements required for the installation of bored crossings may be required and to the extent permanent easements are required they will be acquired by OCWEP by negotiated purchase or pursuant to the EDPL. The use of borings under roads and the CSX rail line will minimize disruption of traffic and the need for reconstruction and resurfacing of roadways. Temporary traffic detours may be needed at road crossings.

Trenching will be used through upland areas along the MWB and OCWEP rights-of-way. Most upland areas along the rights-of-way are active cropland or vacant farm fields consisting of shrubs. Best management construction practices will be used in these areas including soil and erosion control and stormwater management. Disturbed areas will be re-graded and reseeded to pre-construction conditions.

Wetland mapping shows that federal and state wetlands are potentially present in certain parts of the proposed routes of the utility improvements. Should field surveys verify regulated wetlands are present



during the course of preparation for utility line construction, the proposed force mains and gas line will be installed through wetland areas using horizontal directional drilling (HDD) methods to avoid adverse impacts.

Public water service is available from adjacent water lines to the Park. According to correspondence from OCWA (March 19, 2021, see Appendix C) indicates that 3,700 gpm at 20-psi is available for the Park. OCWA indicates the current availability for the Park is 1 MGD. OCWA has plans in place that would allow a supply of 5 MGD within 180 days, and potential to provide 11 MGD at an 18 month to two-year horizon. The expanded Park's estimated water demand of 5 MGD is within the levels OCWA has indicated it can provide, and would not adversely impact the availability or capacity of the local public water supply in the surrounding area. No mitigation would be required.

Future tenants of the Park are expected to provide security and basic emergency preparedness programs for their own facilities. New York State and federal regulatory agencies, such as the EPA, have specific requirements for managing hazardous materials which may be stored on site. Tenants will be required to adhere to all such regulatory requirements. As appropriate based on their industry, tenants of the Park will be expected to have emergency response plans that outline procedures to be undertaken to deal with fire, spills, injuries, etc. Emergency response plans will be reviewed by local officials to ensure that public service providers are properly prepared and equipped in the event they are needed to support tenant security personnel. Tenants are expected to provide on-site water storage for fire suppression and emergency operations. The specifications for fire suppression systems are stipulated in national building and fire codes. The plans for fire suppression and control systems are reviewed and approved by local emergency officials. With the noted life safety, security and emergency response provisions required of future Park tenants, development of the expanded Park is not anticipated to create a burden on the provision of police, fire, and emergency services. No mitigation is required at this time.

Development of the Park will not result in the loss of public open space. The extensive regional opportunities for outdoor recreation will easily accommodate the potential increase in population that is brought to the area by employment opportunities in the Park. Potential development of the expanded Park is not anticipated to create adverse impacts on community parks and/or recreation facilities. No mitigation is required.

It is assumed that the future employment opportunities at the Park could bring up to 4,000 new households to the area. New households and primary school students would likely be distributed throughout the Syracuse MSA. The North Syracuse Central School District enrollment would be expected to increase approximately 1.6% (136 additional students to the current district student population of 8,500 pupils). This increase in the student population is not anticipated to place an undue burden or create adverse impacts on local schools and educational services. No mitigation is required.

OCIDA intends to acquire the property on which the Upstate New York District Church of the Nazarene is located by negotiated purchase or pursuant to the EDPL and other applicable law. The parcel will become part of the Park and the building will be removed, requiring the Nazarene District office to be relocated. Any community services provided by the church at this location (e.g., counseling, meeting



space, day care programs, and clothing and food distribution, etc.) would be curtailed by development of the Park.

### ***Topography, Geology, & Soils***

The topography of the Project Site is generally the same as was detailed in the 2013 FGEIS. The ground is relatively flat to gently sloping, with site elevations ranging from about 380 to 430 feet above mean sea level (amsl). Highest elevations are in the southern portion of the site near NYS Route 31 and the lowest elevations occur in the north part of the site. The site drains to the north towards Youngs Creek, which is a tributary to the Oneida River. Elevation at the expanded Park is most variable along a small ridge located in the central portion of the site. This feature is located approximately 2,000 feet north of NYS Route 31 and generally runs parallel to the road for approximately 3,000 feet. Any potential impacts to topography of the proposed expanded Park would be relatively minor and are consistent with the finding of 2013 FGEIS. No additional mitigation for onsite topographic changes is necessary.

The surficial deposits in the vicinity of the expanded site consist primarily of lacustrine silts and clays deposited in former glacial lakes. These are generally fine-grained and laminated soils. Bedrock beneath the site is mapped as dolostone/limestone, belonging to the Lockport Group. No bedrock outcrops have been noted on the project site. There are no mineral resource extraction areas (gravel pits, mines, quarries, oil/gas wells, etc.) present on the expanded site and the area is seismically stable. Site development will not affect any geologic resources since there are no unique geologic features at the expanded site or in the immediate vicinity. Shallow bedrock is present in some portions of the site and the need for potential blasting during construction and preparation of a blasting plan were discussed in the 2013 FGEIS. No additional mitigation for geologic resources is necessary.

Similar to the park as evaluated in the 2013 FGEIS, the expanded site contains a variety of soils. Based on the physical features of the expanded site, the most likely area for development is west of Burnet Road. In this area, the amount of hydric soils (Cd, FL, and Pb) is approximately 18.7 acres. Hydric soils are characterized by poor drainage. Portions of the expanded site were used for farming in the past. About 40% of the Park soils are considered prime farmland and 9.7% of soils are farmland of statewide importance. Although agriculturally viable soils exist on the site, actual agricultural activity is limited. Most of the expanded site is currently vacant woodlands. Agricultural activities (primarily hayfields) are located at the northern end of Burnet Road. Some cultivated fields also exist in this area. No designated Agricultural Districts exist on the project site and the closest Agricultural District is approximately one-mile northwest (Onondaga County Agricultural Districts, 2019<sup>2</sup>). Although the property currently has only limited agricultural use, future development as a business park/manufacturing site will reduce the availability of suitable agricultural soils. This will result in a small, unavoidable impact. Mitigation for soils was detailed in the 2013 FGEIS and no additional mitigation for onsite soil disturbance is necessary. Offsite utility trench construction will require a NYSDEC SPDES permit for construction. This permit will require that erosion control and site restoration measures be established to mitigate any potential impacts to soil.

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<sup>2</sup> New York State Department of Agriculture and Markets. Onondaga County Agricultural Districts (2019).



### ***Water Resources***

The Park is relatively flat to gently sloping. Groundwater is expected to flow northward, based upon regional topography and surface water drainage, which is consistent with the Park as it is proposed in the 2013 FGEIS.

The expanded Park is not situated within a primary, principal, or sole source aquifer, although the proposed utility and sewer line routes are partially situated within unconsolidated, confined aquifers. The proposed road improvement to Henry Clay Boulevard is also located within this sand and gravel aquifer.

The Park includes several classified streams, including Youngs Creek and several of its tributaries. The proposed gas line connection crosses Shaver Creek and two of its tributaries. The proposed roadway improvements are not expected to comprise of any stream crossings.

There are no FEMA mapped floodplains or Special Flood Hazard Areas within the Park or within the proposed gas line route. The site lies entirely within FEMA flood zone X, which is an area of minimal flood hazard. The preferred sewer line route, however, does have the potential to fall within a mapped FEMA floodplain. Some of the roadway improvements also have the potential to fall within a mapped FEMA floodplain.

Although the Town of Clay and the Town of Cicero are both designated Municipal Separate Storm Sewer Systems (MS4), the site is not located within either of the designated MS4 boundaries. The MS4 boundaries, however, are immediately south and east of the site. As part of the SPDES Construction GP and SWPPP, which is an anticipated requirement of Park development, a MS4 SWPPP Acceptance Form from the Town of Clay and/or Town of Cicero may be required, depending on the off-site locations of the stormwater discharges.

Construction and operational activities at the Park are not expected to have any significant impact to either groundwater and surface water quantity or quality. Furthermore, standard best engineering practices will be employed to minimize any changes to existing topography and vegetative cover which will minimize any related impacts to surface drainage and water quality. As such, no additional mitigation for water resources, beyond what was identified in the 2013 FGEIS is necessary.

### ***Air Resources***

Onondaga County (including the expanded Park area) remains within attainment status of National Ambient Air Quality Standards (NAAQS) for the six criteria pollutants (*i.e.*, ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, particulate matter, and lead). The NAAQS are levels of pollutants in the ambient air that have been determined to be protective of human health, including the health of sensitive subpopulations such as children, the elderly, and those with chronic respiratory problems; in addition, they are developed to protect public welfare, including damage to property and structures, visibility, vegetation, animal species, and other concerns.

Meteorological conditions for the Syracuse and Central New York region have not materially changed since the 2013 FGEIS. As part of any air permit application submitted to the NYSDEC for development



of the Park, meteorological conditions will be considered. The closest National Weather Service (NWS) station to the Park that has the appropriate available data for purposes of an air permit application is the Syracuse NWS station, which is located approximately 9 kilometers to the Southeast of the Park.

There is a broad international scientific consensus that human activity-generated greenhouse gas (GHG) emissions are increasing the concentration of GHGs in the atmosphere and leading to global climate change. While the contribution to climate change of a single project is very small, the combined GHG emissions from all human activity contributes to global climate change. Regulations and policies have been, and continue to be, implemented to address GHG emissions at global, national, regional, state and local levels. Statutes, policies and regulations that are pertinent to potential development in the Park include New York State's Climate Leadership and Community Protection Act ("CLCPA") and regulations under the Clean Air Act. The CLCPA amended the Public Service Law to require the Public Service Commission ("PSC" or "Commission") to establish a program to meet a target of seventy percent of statewide electrical generation from renewable sources by 2030, and a target of zero GHG emissions for statewide electrical demand by 2040. The regulations and programs to be implemented by NYSDEC and the Commission in accordance with the CLCPA are to be conducted in a manner that minimizes costs and maximizes benefits.

NYSDEC recently adopted 6 NYCRR Part 496, which limits statewide GHG emissions in 2030 and 2050 as a percentage of 1990 emissions, per the requirements of the CLCPA. Part 496 limits statewide GHG emissions in 2030 to 245.87 million metric tons of CO<sub>2e</sub>, and 61.47 tons in 2050. Part 496 also includes the 20-year global warming potentials for GHGs that are not CO<sub>2</sub>. The rule applies to all emission sources in New York State, but does not itself impose compliance obligations. The Part 496 statewide emission limits will serve as the baseline for the promulgation of future NYSDEC CLCPA regulations for attainment of the 2030 and 2050 limits. NYSDEC also finalized its Establishing a Value of Carbon Guidelines for Use by State Agencies guidance on December 30, 2020, which is for use by State agencies to monetize benefits/costs of actions that impact GHG emissions based on societal impacts incurred as a result of climate change. CLCPA also requires all state agencies to consider whether its decision to issue permit(s) is inconsistent with or will interfere with the attainment of the statewide GHG emission limits established in ECL Article 75. Where such decisions are deemed to be inconsistent with or will interfere with the attainment of the statewide GHG limits, the agency must provide a detailed statement of justification as to why such limits/criteria may not be met and identify alternatives or GHG mitigation measures to be required where the project is located.

Air quality conditions are influenced by stationary sources and mobile sources of air pollutants. Since 2013, no significant existing stationary sources of air emissions were identified in the vicinity of the Park. The nearest facilities with an air permit are the Buckeye Terminal in Brewerton (approximately 3.3 miles north ) and Barrett Paving Materials in Phoenix (approximately 5.5 miles west). Mobile source emissions are a function of traffic volume and intersection levels of service (LOS). Mobile sources include commuter and truck traffic on NYS Route 31, residential traffic on Caughdenoy Road and other local roads, and occasional emissions from train traffic along the CSX rail line adjacent to the site.





Air emissions resulting from potential development of the proposed expanded Park may be associated with mobile and stationary sources, including transportation vehicles and manufacturing processes, respectively. Potential sources of emissions may be related to manufacturing support systems, heating and cooling, storage tanks, wastewater treatment, and site utilities such as boilers, chillers and back-up generators. Semiconductor manufacturing makes use of processes that require specific chemicals, heat and clean water.

Based on the representative GHG emission estimates for a generic semiconductor manufacturing operation, GHG emissions from the expanded Park could include the following:

- Direct GHG emissions associated with natural gas and fuel oil combustion in boilers, thermal incinerators and other miscellaneous natural gas-fired sources
- Carbon dioxide emissions from the oxidation of volatile organic compounds (VOCs) from the expected use of liquid chemicals
- Specialty gases used in the manufacturing process, including fluorinated and chlorinated GHGs.
- Indirect (upstream) GHG emissions from the import of natural gas and fuel oil

Potential direct annual GHG emissions at the expanded Park could range from 150,000 metric tons carbon dioxide equivalent (MTCO<sub>2</sub>e) to 350,000 MTCO<sub>2</sub>e. Approximately 10-15% of these GHG emissions are expected to result from the use of specialty gases including nitrogen trifluoride and sulfur hexafluoride, which have 20-year global warming potentials (GWP) of 12,800 and 16,300, respectively. Indirect (upstream) potential annual GHG emissions from the import of fossil fuels could range from 150,000 MTCO<sub>2</sub>e to 250,000 MTCO<sub>2</sub>e. For purposes of minimizing GHG emissions, future tenants will be encouraged to promote green infrastructure and energy efficiency (Section 9.0) and, to the extent feasible, use renewable forms of energy to power operations.

As noted in the 2013 FGEIS, all future industrial development will be subject to applicable air emission permitting under NYSDEC. Such an application will be required to be submitted to NYSDEC who will, in turn, review the application in accordance with all applicable state and federal laws, and impose appropriate permit conditions. NYSDEC will also undertake a review of the potential development's GHG emissions under the CLCPA. Facilities locating within the Park will have to meet air emission permit requirements designed to meet the NAAQS and comply with all applicable regulatory requirements. NYSDEC will impose, as appropriate, permit conditions to implement emission control equipment and other operating parameter and conditions, which any prospective tenant will be required to abide by. In addition to the permitting requirements, mitigation for air pollutant emissions include material handling protocols and industrial good housekeeping practices.

The boilers, incinerator and diesel generators that will be operated at the facility will be new. For the purpose of promoting efficient operation and reducing the potential for excess GHG emissions, these sources will be operated in accordance with the manufacturer's instructions. Boiler maintenance and testing will also be conducted in accordance with the manufacturer's instructions. Dual-fired boilers will be operated such that fuel oil will be used as backup and only when natural gas is not available. Some specialty gases that will be used in processes at the facility will have built-in point of use (POU)



abatement devices which are integral to the processes. POU waste streams are conveyed to the central house scrubbers for further reduction.

With respect to mobile emissions, road and intersection improvements adjacent to the Project site will provide for smoother traffic flow and reduced delays along access roads to the Park. Movement of goods and materials for use by rail will help reduce the amount of truck traffic to and from the Project site. Combined these efforts are expected to generally reduce air emissions associated with potential future development of the Park, including GHG emissions.

Construction-related air quality impacts will be temporary, and mitigation will be implemented to control fugitive dust problems by sweeping and wetting down road surfaces and laydown areas used by haul vehicles. In addition, existing vegetative buffer areas will be maintained to the greatest extent practicable on-site to reduce wind-blown dust. Maintaining vegetated buffer areas and re-vegetating disturbed areas as soon as practicable along the periphery of the Park and internally alongside wetlands and other surface features will help control stormwater runoff and fugitive dust from moving off-site. Erosion and sediment control practices for sediment and dust will be implemented on-site and along utility routes being utilized for the installation of utilities.

### ***Odor***

Odors can result from emission of organic and inorganic compounds. Different compounds produce different odors and have unique detection and recognition thresholds. Without proper mitigation, the potential exists for odors to occur. As noted in the discussion of air impacts and mitigation, facilities manufacturing semiconductors utilize a variety of controls to reduce the concentration of pollutant emissions.

### ***Ecological Resources***

Due to the proposed Park expansion, additional mapped wetland areas were identified that were not previously discussed in the 2013 FGEIS. The Park now includes mapped NYSDEC wetland BRE-11, as well as additional mapped NWI wetlands, including NWI wetland classification codes PSS1/EM5C, PUBFH, PFO1C, R5UBH, PUBHx, and PEM5E. These mapped wetland areas are primarily situated on the far eastern and northern portions of the Park. Although NWI mapping indicates the potential presence of federal wetlands regulated by the U.S. Army Corps of Engineers (USACE), the USACE does not publish official wetland maps. These mapped wetlands, including those shown outside of the NYSDEC-mapped boundaries, would also be subject to the recently revised definition of regulated waters under the 2020 federal Navigable Waters Protection Rule, which is narrower in scope and has resulted in an overall lessening of what is considered regulated waters (including federal wetlands) as compared to previous rules and definitions. The definition excludes from the definition of “waters of the United States,” non-adjacent wetlands that do not directly abut or have regular surface water overflow/inundation from intermittent or perennial streams, including wetlands that are adjacent to ephemeral streams, ditches, and prior converted cropland. As such, the extent of regulated wetland areas may be less than shown on the wetland mapping, including those wetland areas discussed in the 2013 FGEIS. Field reconnaissance, and



if necessary, delineation, based on a conceptual plan for a specific development, will confirm the regulated status of wetland areas potentially impacted, if any.

Land cover types within the expanded Park are mostly consistent with the smaller footprint. Based on review of the NLCD Land Cover data, more than three-fourths of the expanded Park is made up of upland cover types. These communities represent approximately 1,003 acres, up from the approximately 276 acres identified in the 2013 FGEIS, which is approximately 80% of the expanded footprint.

As in 2013, there are no critical environmental areas or significant natural communities within or in the vicinity of the project area.

Based on the wildlife species previously observed on the site, potential development at the expanded Park has potential to affect common wildlife species and their associated habitats, although no substantial critical habitat loss is anticipated.

USFWS and NYSDEC/NYNHP identified the following federal- and state-listed threatened and endangered species as having the potential to be impacted by the Project: Sedge wren; Eastern massasauga; and Indiana bat. However, based on the available resources reviewed, there are no threatened and endangered animal species identified by the NYSDEC/NYNHP and USFWS known to inhabit or frequent the Project site. Further confirmation of the absence of these species and habitat at the park would be determined through site reconnaissance once a specific development for the Park is proposed.

Ecological resources, such as wetlands and wildlife habitat would be avoided and minimized to the maximum extent practicable through careful site planning and design. Mitigation is not anticipated if wetland areas are avoided. If a specific development design cannot entirely avoid regulated wetland areas, the Park includes ample space onsite for mitigation wetlands to replace any lost wetland benefits, if necessary.

As there are no anticipated impacts to rare, threatened, or endangered wildlife species or communities, specific mitigation is not required.

Future site development activities, including utility line construction and roadway improvements, however, will be monitored for any occurrence of the identified potential threatened, endangered, or species of special concern, including the Sedge wren, Eastern massasauga, Indiana bat, Osprey, and Sharp-shinned hawk to ensure that construction activities will avoid any direct harm to these listed species. Additional coordination with NYSDEC will also be made prior to the commencement of development activities for concurrence and further guidance, as wildlife/habitat survey(s) may be required (i.e., a grassland breeding bird survey).

### ***Cultural & Archeological Resources***

The proposed Park expansion contains approximately 1,250± acres of land, much of which was historically used for agriculture. Most of the land is presently cleared, while some is overgrown, and a portion has been used for the Clay-Teall Transmission Line. Burnet Road bisects the property and is lined





on both sides with an assortment of historic-aged buildings, including residential dwellings and agricultural buildings.

A Phase I Archaeological Survey Report was conducted for the 340± acre Park footprint in 2014 which resulted in a “No Effect” finding on historic properties listed or eligible for listing in the National Register of Historic Places. In response to OCIDA’s lead agency notification letter for the SGEIS, NYSDEC provided that the statewide inventory of archaeological resources records, maintained by the New York State Museum and the New York Office of Parks, Recreation and Historic Preservation, and the expanded Park is not located within a previously designated archeological sensitive area.

Per the New York State Cultural Resource Information System (NYS CRIS), 13 previously identified above-ground historic resources are located within the expanded Park area. Two of these resources are located on the north side of NYS Route 31 and the remaining 11 resources are located along Burnet Road. Seventeen additional previously evaluated resources are located within the immediate vicinity of the expanded Park. Of the 30 previously identified resources, one resource has been determined eligible for listing in the National Register of Historic Places (NRHP) by the New York State Historic Preservation Office (NY SHPO) and 20 have been determined ineligible. The eligibility status of the remaining 9 resources is undetermined.

Residential and agricultural properties constructed prior to 1972 meet the age requirement for consideration for listing in the NRHP. Based on a review of historic aerial photographs, approximately 26 structures which have not been previously evaluated for NRHP eligibility are in the vicinity of the expanded Park and associated utility and roadway corridors. One property on Caughdenoy Road, two on NYS Route 31, and approximately eight properties on Burnet Road contain buildings which appear to have been constructed prior to 1895. Based on historic aerial photographs, most of the remaining historic-age properties appear to have been constructed between 1956 and 1972. The proposed underground utility corridors are primarily located within existing rights-of-way and their construction is not likely to impact above-ground historic resources in the vicinity of the proposed routes.

According to NYS CRIS, the expanded Park is not located within an archaeologically sensitive zone. Small portions of the utility corridors map overlap with archaeologically sensitive zones near previously identified historic-period archaeological sites, but the utility corridors are primarily within previously disturbed areas and rights-of-way.

SHPO is an involved agency and OCIDA will follow the recommendations of SHPO with regard to any further evaluation of cultural and archeological resources within the expanded Park. Should any work be required by SHPO, it will be completed by qualified professionals.

### ***Visual Environment & Aesthetic Resources***

The Park is presently undeveloped and generally consists of a mix of large upland areas of open field (former agricultural land), shrub and woodland areas interspersed with wet areas. Topography in the area is generally flat to gently sloping. In general, the predominance of vegetation surrounding the site and the relative lack of development contributes to the area’s rural character. This character is influenced by



former farmsteads, scattered housing along Burnet Road, accessory structures (garages, sheds) and some small business and industrial uses primarily along Caughdenoy Road and NYS Route 31. National Grid's Clay electrical substation west of the OCIDA site and the transmission towers and high voltage power lines that spread outward from the substation into and across the northern one-third of the site are dominant elements in the local visual environment. The existing CSX rail line also contributes to the somewhat industrial nature of the area. A cell tower located north of NYS Route 31 near the site's southeastern corner as seen above also influences local views near the site. The relative lack of significant development in the immediate vicinity of the Park, especially views from NYS Route 31 and points east, west, and south of the Route 31 corridor creates the sense of a rural area both during daytime and nighttime periods. Nighttime lighting is generated by existing residential and small businesses as well as by vehicular traffic on local roads. The area does not possess the more suburban characteristics of developed areas located one-half mile or more to the east, west, and south where residential and commercial development has been occurring in recent years.

Distant views of the Park are very limited due to existing stands of woodland and shrub vegetation. The area lacks elevated viewpoints from which the Project can be seen. Most views are therefore highly localized and in general well within one to two miles or less from areas surrounding the Project site. Views of the Park are most significant from Caughdenoy Road and to the east across open fields and farmlands and former farmlands along Burnet Road.

In late 2000, Integrated Site, Landscape Architect, P.C., a consulting firm, conducted a view shed analysis of the Park to determine the potential visual impact of a semiconductor manufacturing plant considered for the Park at that time. Elements of that study and its conclusions remain valid and are discussed in Appendix D.

Due to the expansion of the Park, and the issuance of the 2019 New York State Department of Environmental Conservation's Program Policy DEP-00-2 "Assessing and Mitigating Visual and Aesthetic Impacts", an updated Visual Impact Assessment was performed to supplement the original. The updated assessment included a review of previously identified sensitive receptors, identification of new receptors as defined by the 2019 NYS Policy, assessment of views from those locations, and identification of mitigation strategies for potentially impacted locations. The 2019 policy focuses on resources of National, State, and local significance that are open to the public.

The updated Visual Impact Assessment identified a total of 52 sensitive receptor locations that could potentially be impacted by development of the Park. Of those 52 locations, 34 were identified in the previous assessment and 18 were additional locations identified within a 5-mile radius of the Park.

Sites determined to have partial or open views to the site will be further assessed as the site development plans are advanced. The developers will work with the county and local agencies during the site development process to identify the best strategies to mitigate any potential visual impacts from the proposed development. Each site will be individually reviewed based upon the site development plans to determine the type and extent of the visual impacts, and to reach consensus on the most appropriate site-specific methods of mitigating those impacts. Based upon the criteria identified in the 2019 NYSDEC Policy, no significant adverse visual impacts to identified public resources are anticipated.





Author:Dennis R. Roote, P.E. Subject:Highlight Date:6/3/2021 12:27:24 PM

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A CSX rail line does not make the area "Industrial"

Best management practices implemented during design and construction of the Park will mitigate several visual impacts that could occur with potential industrial development of the Park. More site-specific measures that can be implemented include construction and placement of earthen berms, native plant material, forested buffers, context sensitivity, camouflage/disguise, low profile and consolidation, efficient directional lighting, landscaped site entrances and curved access roads, and integrating mitigation efforts with other site design considerations such as stormwater management areas, safety and security features, fencing, berms, screening walls, building placement, landscaping, etc. No significant adverse visual impacts are anticipated.

### *Lighting*

The Project site is predominantly undeveloped, therefore, there is very little light being generated from the site. Light generating sources in the area consist primarily of residences and the cell tower located onsite along NYS Route 31 which has two red warning lights mounted approximately at the mid-point of the tower. These are visible within a quarter mile approaching the tower in both directions. This lighting type, color, and intensity is typically dictated by FAA standards for obstruction marking and lighting. The cell tower will require relocation to an area outside the Park boundary, however, given the relatively close proximity to the Syracuse Hancock International Airport, the new cell tower may require similar lighting.

Any facilities potentially established in the Park will require exterior lighting in the form of roadway, parking lot, and building exterior lighting, to provide adequate safety and security for the employees and visitors to the site. The goal of the site lighting plans will be to provide the necessary light levels for safety and security onsite, while avoiding or minimizing glare, reducing light trespass, and reducing skyglow. The lighting design for the site will seek to use Dark Sky friendly lighting fixtures. The lighting design for the approach roadways (NYS Route 31 and Caughdenoy Road) and interior roadways on the site will follow the Illuminating Engineering Society (IES) Recommended Practices for lighting of exterior environments (RP-33-99) and for parking lots (RP-20) to avoid or minimize glare and trespass lighting. The lighting design for the roadways and parking lots will direct light downward using techniques such as cutoff fixtures and shielding. These techniques have proven to be effective in minimizing glare and trespass light that may be detrimental to humans, plants, and animal species surrounding the developed areas of the site and its approach roads. The proposed roadway improvements outside the site will be designed with standard roadway lighting complying with the current NYSDOT HDM Chapter 12 and the NYSDOT Policy on Highway Lighting for highway lighting. Prior to installation of new highway lighting, the locality must agree to be responsible for the operation and maintenance of the new fixture. The luminaire selection for the roadways will be specified according to the IES. The lighting equipment will be selected based on the locality preferences and standards specified in the NYSDOT HDM. Lighting solutions that may create spillover or glare on offsite resources will not be considered for lighting of the roadways.

The site is within five miles of the of the Syracuse Hancock International Airport. This falls within the limits of requirements for obstruction lighting of any onsite structure 200 feet tall or greater. (USDOT FAA Advisory Circular AC70/7460-1M dated 11/16/2020). The development of the site has established a maximum height of 160 feet for any structures built on the site. This would indicate that there will be no





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requirements for Obstruction lighting on the site. Further coordination with the Syracuse Hancock International Airport and the FAA during site design will be required to confirm that no structures erected on the site will require Obstruction Lighting.

### *Noise*

The noise impact analysis included impacts from construction and operational activities associated with the proposed expansion of the Park, and also impacts from anticipated roadway improvements. Existing noise in the proposed expanded Park area is generated mostly by vehicular traffic on NYS Route 31 and adjacent roads. Occasional freight trains traveling along the existing CSX rail line near the site, including train signal horns at the existing Caughdenoy Road grade crossing, contribute to the sound environment. Other noise sources in the area include occasional activities such as use of farm tractors and lawn mowing equipment, and wildlife sources typical of a local residential environment. Observed average daytime ambient sound levels in the vicinity of the Park range from 48.0 dB(A) to 73.5 dB(A), with corresponding nighttime ambient sound levels presumed to range from 41.0 dB(A) to 62.9 dB(A).

Receptors potentially sensitive to noise in the project area are generally single- and multi-family residential homes along Caughdenoy Road, NYS Route 31, Verplank Road, and surrounding roadways. Highly sensitive receptors such as schools, libraries, hospitals, and parklands do not exist near the Park, although two local parks are located to the west and southeast along NYS Route 31.

Based on a potential development and a conceptual footprint over the prime developable area, a noise impact assessment finds that:

- Operation of the Park is not anticipated to increase sound levels above current daytime levels at surrounding property lines or sensitive receptors.
- Operation of the Park may increase sound levels above current nighttime levels at surrounding property lines or sensitive receptors by up to 4.4 decibels. Per NYSDEC guidance, sound level increases of this magnitude are considered “unnoticed to tolerable,” and present the potential for adverse impacts only in cases of the most sensitive receptors
- Temporary and intermittent construction activities at nearby receptor property lines has the potential to increase sound levels by more than 10 decibels.

Site layout, operations schedules, natural buffers, vegetative screening, and earthen berms or engineered sound barriers can be employed to mitigate potential noise impacts. At a minimum, the following mitigation measures will be incorporated into the various phases of site development to reduce potential noise impacts.

- Community accessible information including construction schedules will be prepared by project tenants and made available at suitable locations (door-to-door, websites, town offices) to notify neighbors of upcoming work. A complaint resolution process will be implemented and monitored by the tenant and/or OCIDA during construction.
- All construction equipment will be maintained with properly functioning noise reduction muffler systems per manufacturer’s specifications as part of construction contracts and contractor responsibilities.





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Will the anticipated tenants generate additional rail frequency? will the development include a spur into the park?

- Earth-moving equipment will be restricted from “tail gate banging” during sensitive times of the day (early morning and late evening) and when operating near residential receptors.
- Building construction near adjacent residential receptors will consider phasing opportunities and scheduling work to reduce potential noise impacts by erecting buildings, berms, stockpiling materials, structure placement, etc. to interrupt sight lines and therefore reduce noise levels being generated in the direction of sensitive receptors as construction advances on-site.
- Haul roads, access drives, materials storage areas, staging areas, etc. will be placed as far from sensitive receptors and internal to central portions of the site to the greatest extent practicable.
- Limiting construction to normal daylight hours to the greatest extent practicable. If nighttime construction is required, consideration will need to be given to use of variable level audible back-up alarms on heavy equipment, and/or use of strobe lights or other OSHA approved safety devices.
- Establish a project hotline (website and phone numbers) so residents can be kept informed of the status of project construction and obtain information for forwarding on complaints relative to construction activity due to noise, dust, work hours, etc.

### ***Human Health***

Human health considerations address potentially sensitive receptors in proximity to a project. The proposed expansion of the Park is within 1,500 feet of the recently built Cottages at Garden Grove Nursing home. This facility is approximately 200 feet east of the eastern site boundary. Grace Evangelical Covenant Church is also located just south of the site along NYS Route 31. The church, which has after-school programs for children, is located just west of Burnet Road and about 2,500 feet west of a possible NYS Route 31 entrance to the expanded Park.

Due to the anticipated construction and operations of the expanded Park, there could be activities that cause some degree of change to the physical aspects of the surrounding area, including the potential for increased traffic, air emissions and noise. These changes have the potential to cause small to moderate impacts to the human health of surrounding residents including the sensitive receptors identified above.

Minimization and mitigation for temporary impacts during construction activities include restrictions on site access, hours of construction activity, delivery of equipment and materials to the site, measures to control dust from disturbed soil, best management practices for temporary fuel storage, and flagging/traffic control measures to protect all modes of travel within any construction area or public right-of-way. During future operations, general impact minimization and mitigation measures will require that the future site tenants obtain all necessary local, state, and federal permits, demonstrating that they are developing and operating the site in accordance with all regulatory requirements and laws. Mitigation measures for potential impacts related to traffic, air quality and noise will include improvements in intersection designs, implementation of air emission control devices, compliance with air emission limits, and use of vegetative/earthen noise barriers between new facilities and neighboring properties.





## Cumulative Impacts

It is anticipated that the expansion of the Park and future development of the Park for industrial semiconductor manufacturing will induce similar cumulative impacts and effects to the area as were identified in the 2013 FGEIS. It remains possible that the expanded Park could be a catalyst to additional industrial and business development in this area. Particularly, the area to the west of the Park along Caughdenoy Road that is already zoned for industrial uses (I-2). The addition of the sewer line to and through this area further adds to the attractiveness to develop this area for industrial or business use.

There are several new developments in various stages of approval and review by the Town of Clay Planning Board. The two most relevant developments are a 60-unit senior housing complex along Brewerton Road east of the Park, which was recently approved by the Town of Clay Planning Board for construction. There is also a mixed use Planned Development District (PDD) on the corner of NYS Route 31 and Henry Clay Boulevard that will soon be presented to the Town of Clay Planning Board for approval. If approved, this new PDD will include approximately 100 ± apartments and some mixed-use retail units on the bottom floors towards the front of the parcel. It is not anticipated that the construction of either of these potential developments would create cumulative impacts if constructed concurrently with the development of the Park.

The development of the expanded Park or any surrounding areas that develop as a result of development at the Park could create positive cumulative impacts and economic spin-off. This could include an increase in employment opportunities, increases in local discretionary spending providing additional sales tax revenues to State and local governments, demand for new goods and services support businesses, and further diversify the tax base of the Town of Clay.

The installation of sewer force main along NYS Route 31/Caughdenoy Road intersection and northward along Caughdenoy Road paired with the various intersection improvements along NYS Route 31 will likely make this area attractive to industrial and business uses as well. Added industrial and business uses would increase traffic along NYS Route 31 and Caughdenoy Road. The additional traffic on NYS Route 31 could impact levels of service at several intersections and require improvements at a quicker pace than presently expected as discussed in Chapter 4 Section 4.3.

Potential new growth and economic expansion could create some adverse cumulative impacts. Changes in surrounding land use could put additional demand on sewer capacity and wastewater treatment at the Oak Orchard WWTP and may require upgrades to capacity at the plant to support future growth in the area. The conversion of undeveloped land to other uses will cause a loss of vegetation and wildlife habitat. Encroachment and impacts to features including but not limited to wetlands and floodplains may occur. Changes in visual character from relatively undeveloped land to increased densities may also result. Depending on the nature and extent of development, there may be increased demand on municipal services for fire, police and emergency services. There may also be increased demand on housing, schools and local utilities. The mitigation of these potential impacts will need to be determined as new development projects are introduced and will need to be coordinated at that time with the Town of Clay and possibly other entities and Involved Agencies.



Road improvements, the provision of infrastructure, particularly expanded sanitary sewer capacity at the Oak Orchard Wastewater Treatment Plant, and the potential cost implications for increased municipal services in anticipation of further development of the area would require local, State and federal funding. The establishment and implementation of policies at the Town and County level will be required to manage land use and infrastructure development along and especially north of the NYS Route 31 corridor to control the potential for adverse effects of additional development in the area. These policies may be established through the *Town of Clay Northern Land Use Study* and/or the Onondaga County Comprehensive Plan update. Implementation could also be accomplished through Town zoning and County Section 239 project reviews.

## Unavoidable Adverse Impacts

Many of the unavoidable adverse impacts that are likely to result from the expansion of the Park remain similar to those anticipated during the 2013 FGEIS. The difference is the geographic extent given the proposed Park expansion, which could result in greater impacts but also allow for additional buffers to avoid, minimize, and mitigate certain impacts (e.g., ecological, noise, etc.). The unavoidable impacts include the following.

### *Construction Impacts*

It is expected that the expansion of the Park and subsequent construction activities during the development of the Park will generate some temporary impacts as an unavoidable consequence of the development of the Park. These impacts and their intensity will vary throughout the phase one development of the Park. Impacts are likely to include an increase in truck traffic on nearby roads, primarily NYS Route 31 and Caughdenoy Road as construction workers and materials are transported to and from the Project site.

As identified in the 2013 FGEIS, heavy machinery and construction equipment will be used throughout construction. As a result, noise levels will increase in surrounding areas during construction activity. Limiting the placement and storage of equipment and materials as far as possible from residences surrounding the Park will help to mitigate the increase in noise levels. Construction activities will also be limited to normal daytime hours whenever possible consistent with the Town of Clay Noise Ordinance requirements to minimize impacts to nearby residents.

Excavation and the transport of materials have the potential to create fugitive dust from unpaved surfaces depending on wind direction and drying conditions. Dust will be controlled by sweeping adjacent roads to the Project site and watering access roads on site as needed. In addition, in compliance with State water quality and stormwater management regulations future development will require a complete detailed Erosion and Sediment Control and Stormwater Pollution Prevention Plan prior to any construction. These plans will be developed by future project tenants in compliance with all local, State and federal regulations. Contractors working on site will also be required to follow best management construction practices to reduce the potential for soil erosion, dust, noise, traffic and other construction impacts.



### ***Traffic***

An increase in traffic will result from construction and development of the expanded Park. Traffic is also projected to increase from other developments occurring in the area and will change the existing levels of service at certain intersections along NYS Route 31. Therefore, roadway improvements along NYS Route 31 are proposed based on existing and future traffic volumes. Regardless of development at the Park, transportation improvements will be required along NYS Route 31 as other development occurs over time.

### ***Air Quality and Noise***

Future industrial use at the expanded Park will result in increased traffic, including employee vehicles, trucks, and the possible use of rail. This will increase noise and air emissions from the Park area. There will also be an increased use of energy, water and wastewater treatment resulting from development, but the exact degree of increase is unknown at this time. The use of natural gas for process heat demands and thermal oxidizers for the destruction of volatile organic compounds will generate combustion related air pollutants. The use of chemicals in manufacturing processes will generate non-combustion air pollutants. Emission control equipment will be utilized to reduce the emission rates and overall volume of released pollutants.

### ***Ecology***

Areas of open field cover type within the Park will be developed. It is anticipated additional upland shrubland and woodland habitat areas will also be affected. Impacts to state and federal jurisdictional wetlands will be avoided to the maximum extent practicable, but to the extent a specific development project cannot entirely avoid or minimize impacts to wetlands, associated habitat areas may also be impacted by development of the Park. This is consistent with the findings of the 2013 FGEIS. Much of the Park will maintain its natural habitats as areas set aside from development. Some areas on site that may experience temporary disturbance from construction activities could return to vegetated locations (i.e., stormwater management areas, landscaping, and visual buffers). As such, suitable wildlife habitat will be present in the Park in areas avoided by development or that are restored following construction.

### ***Visual Character***

Similar to the analysis in the 2013 FGEIS, the development of the expanded Park site will alter the visual character, which currently consists of single family rural residential plots, undeveloped rural open space comprised of former farm fields, and shrub and woodland. The future development at the expanded Park will instead include industrial buildings, parking areas, support facilities, and internal roads. It is anticipated that during the development at the expanded Park the wetlands within the Park will remain undeveloped.

Visual changes resulting from construction and development are unavoidable. Measures to reduce the effects of visual changes include the placement of additional vegetative buffers and landscaped berms at key locations around the site, particularly along the western and southern periphery of the site to screen views and mitigate noise.



The need for specific visual mitigation measures will be determined once tenants are known and the degree of potential visual impact is determined. Building placement, the use of attractive building materials and structural design features and landscaping will be encouraged by OCIDA to enhance the appearance of buildings and grounds. Appropriate lighting fixtures and other site design features will be determined in coordination with the Town of Clay's site plan review process.

### ***Displacement of Existing Property Owners***

In order for Project objectives to be achieved, OCIDA must increase the size of the Park to make it more attractive to potential future tenants, specifically tenants in the semiconductor industry. The proposed expanded Park footprint requires that OCIDA acquire certain residences along Caughdenoy Road, NYS Route 31 and approximately 3 dozen residences along Burnet Road. These residential properties have been acquired or will be acquired by OCIDA through negotiated purchase agreements or pursuant to the EDPL and existing owners will need to relocate. OCIDA must also acquire the property on which the existing telecommunication tower is located.

The properties along NYS Route 31 and Burnet Road represent a significant portion of the expanded Park's prime developable area and are therefore a necessary component of the Project. Existing structures and improvements will ultimately be demolished and/or removed in furtherance of the potential future development of the Park. Demolition activities will be conducted in accordance with Town of Clay requirements, and all debris will be disposed of at authorized off site facilities in accordance with applicable regulations. The telecommunications tower will need to be disassembled and relocated. The acquisition and removal of the residences along Burnet Road allows for the expansion of the Park footprint to accommodate large-scale campus like development for tenants and will enable maximum use of setbacks and buffers between the prime developable area of the Park and the nearest land uses to the east along and off of Brewerton Road in the Town of Cicero.

While the removal of the aforementioned residences and tower are unavoidable, owners will receive fair market value for their properties, thus enabling them to relocate within the Town of Clay or elsewhere. OCIDA will also pay the seller's normal transaction costs of updating the title and survey, recording fees, transfer taxes and other similar expenses in connection with the transfer of these properties as well as the pro rata portion of real property taxes, water rents, sewer rents, special ad valorem charges and other similar charges. In the event it is necessary to acquire any such properties pursuant to the EDPL, as condemnor, the Agency will offer just compensation based on the fair market value determined by its highest approved appraisal, and the respective property owners will have the right to challenge the amount of such just compensation under EDPL Article 5. The Agency will also pay, upon acquisition, any costs associated with recording fees, transfer taxes, penalties incurred by the condemnee for prepayment of any preexisting recorded mortgage entered into in good faith encumbering the property, and the pro rata portion of real property taxes, water rents, sewer rents, special ad valorem taxes and other similar charges.





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This is an economic factor not to be included in an environmental impact statement.

## Growth-Inducing Impacts

The growth-inducing impacts that are likely to result from the expansion of the Park remain similar to those anticipated during the 2013 FGEIS.

### *Population Growth*

It remains reasonable to expect that the development of the expanded Park will result in some direct and secondary growth impacts to the surrounding community. Direct impacts will result from the development of the Park itself. Secondary impacts such as industrial-related support businesses or other commercial businesses being established near the Park are also possible.

Direct impacts will include job creation both on a temporary basis during construction and long-term employment once buildings and ancillary facilities are completed and become operational. It is anticipated that construction of a campus for large semiconductor industrial tenant will occur over the course of a year or more.

Most job opportunities created during construction will be filled by the local labor pool. However, it is anticipated that the development of the expanded Park will bring approximately 4,000 full-time high paying jobs to Onondaga County. The potential exists for many of these new jobs to be filled by people that are not currently living within the Syracuse Metropolitan Area, meaning that there could be a proportional increase in the number of households as well as the need for new housing.

It is estimated that the North Syracuse Central School District enrollment would increase by approximately 1.6%. This increase in school population is not anticipated to place an undue burden on local schools and educational facilities, mainly due to the recent decline in the Syracuse Metropolitan Area population and resulting decline in the student aged population.

### *Infrastructure-Induced Growth*

The development of the expanded Park will necessitate the construction of new infrastructure. The most important infrastructure improvements that are needed to support the proposed development include the traffic mitigation improvements described in Section 4.1.10, the installation of sewer force mains being designed to support the greater Oak Orchard District and a gas line as described in Chapter 3 and 4, Sections 3.4.1 and 4.4.1, respectively.

Utility connections on-site will not result in substantial growth-inducing impacts since its effects will be in support of on-site uses, but these new utilities could encourage some new growth along their conveyance routes. The availability of public sewer has the potential to foster additional development in this portion of the Town of Clay, which remains relatively undeveloped at the present time. The ability to tap into the force mains is subject to State, County and Town of Clay review and approvals. As such development will be managed by these entities and by the available capacity of wastewater treatment at the Oak Orchard Treatment Plant. Formation of a new sewer district to serve the Clay Business Park could help manage growth in the area. The County can service up to 4 million gallons per day (MGD) at Oak Orchard for the Park.



Transportation improvements along the NYS Route 31 corridor could also accelerate and accommodate increased development activity. Traffic improvements will be required along NYS Route 31 as development occurs. Traffic mitigation improvements proposed to support the expanded Park are not likely to induce further growth alone without other improvements along the corridor.

Development in the vicinity of the expanded Park could take several different forms at varying scales and densities depending on real estate market conditions and trends when new sewers come online. It is expected that future development in the vicinity of the Park will be in accordance with the Town of Clay Zoning Code and any related regulations or requirements in effect at the time. Under current zoning, this could translate into additional industrial development west of Caughdenoy Road and along NYS Route 31.

Development of residential uses could also occur in the vicinity of the Park as the result of sewer availability. Residential uses, perhaps as new residential subdivisions along NYS Route 31 south and east of the Project site may occur in areas presently zoned as RA-100.

All new development that occurs off-site will be subject to Town of Clay zoning requirements and site plan review. Such projects will also be subject to an environmental review under SEQRA conducted by the Town and/or other Involved Agencies at the time a specific project is proposed. Potential adverse environmental impacts will be identified, evaluated, and subject to project-specific mitigation measures on a case-by-case basis as part of the SEQRA review process.

## **Irreversible and Irretrievable Commitment of Resources**

Similar to the 2013 FGEIS, it is anticipated that the expansion of the Park and subsequent development of the Park will require similar commitments of various types of community resources by OCIDA, Onondaga County and other entities including the private sector as investment and development of the Park progresses.

The irreversible commitment of physical resources will include the conversion of approximately 4.0 million square feet of the expanded Park to building footprint and additional support facilities in support of industrial semiconductor uses. There will also be 50± acres of parking (which may include parking garages), loading areas, access and internal circulation roads at the expanded Park.

As evaluated in the 2013 FGEIS, the prime developable area of the Park generally consists of fields, shrubland, and some woodland areas. Residential properties may now be part of the prime developable area given the proposed expanded footprint of the Park along Burnet Road. Also similar to the 2013 FGEIS, areas that are likely to remain mainly undeveloped generally consist of wooded upland, wetlands and NYSDEC wetland buffer areas.

As analyzed in the 2013 FGEIS, development of the Park will require soil disturbance as well as the loss of vegetation and wildlife habitats. However, the goal will be to avoid wetlands and mature habitats to the maximum extent practicable by focusing development in the prime developable area. Topsoil will be stockpiled for use on-site for landscaping, whenever possible. Trees removed for development will be





considered for sale as timber and other vegetation cleared from the Project site will be recycled as mulch and landscaping, when practicable. The only difference from 2013 may be the amount of soil disturbance and trees impacts from development given the proposed expansion and greater Park acreage.

Development will include the commitment and consumption of building and construction materials including concrete, asphalt, steel, lumber, plastics and other raw materials and finished products. Development will require the consumption of water, electricity, fuel (gas and diesel), oil and other petroleum products. Additional materials and energy resources will be consumed by tenants for industrial processes. The provision of utilities for water, sewer, electrical, natural gas, and telecommunications will be required throughout construction and operation of facilities. The use of materials and goods are expected to be met by the region's supply. Nevertheless, as in 2013, this represents an irreversible and irretrievable commitment of these resources that will not be available for other uses.

The proposed Action will also require public and private services, including, but not limited to, solid waste disposal, police, fire and emergency services, as expected with any large-scale development and as detailed in the 2013 FGEIS. Commitment of these resources is an anticipated outcome of an industrial park's development.

## **Effect on the Use and Conservation of Energy Resources**

Commitment and indication of adequate capacity from National Grid to support the expanded White Pine Commerce Park with Natural Gas and Electric utility service was received. The expanded Project Site is capable of supporting a mix of industrial and/or commercial use facilities located in a campus-like setting. The facilities will consume natural gas and electricity as a result of normal operations.

It is anticipated that approximately 25 acres of the site could be used for a potential electrical substation and gas regulator station to support the energy needs of the expanded project site. This space has potential to be a central energy facility intended for energy distribution to the campus facilities and buildings while minimizing the quantity of equipment needed and maximizing energy efficiency.

The expanded Park may employ up to 4,000 employees and operate up to 4 million square feet of facilities. Potential facilities include the following use types:

- manufacturing/fabrication/assembly space
- laboratory, research and development (R&D) space
- logistics, warehousing, and/or shipping & receiving space
- office and administration space
- manufacturing support facilities, outdoor utility spaces, maintenance areas, waste facilities, and service/storage yards
- on-site energy generation or electrical substation space
- wastewater treatment systems or pump stations
- paved area for parking (which may include parking garages), loading, internal road circulation and/or shipping/receiving areas





Although the objective of expanded Park is to develop the site for the semiconductor and manufacturing industry, the actual demand for energy can vary greatly according to the types of industries and businesses eventually located in the Park.

US Energy Information Administration's (EIA) 2018 Manufacturing Energy Consumption Survey identified that manufacturing facilities, on average, consume 95.1 kilowatt-hours (kWh) of electricity and 536,500 British thermal units (Btu) of natural gas per square foot annually. This average can increase or decrease significantly depending on the facility use type, manufactured product, and manufacturing process.

Buildings and uses designed for the expanded Park will be constructed utilizing equipment and systems in compliance with energy conservation and building code standards as set forth by New York State Construction Codes. New York State has several codes and NYS programs related to their building energy code. These include the State Energy Conservation Construction Code (SECCC), the NYS Executive Order No. 111, and The New York Energy Smart Program.

The SECCC determines the minimum energy conservation requirements for new buildings including heating and ventilating, lighting, water heating, and power usage for appliances and building systems. Specific design requirements are related to the climate zone the building is located (Onondaga County, Zone 5A). Low energy and equipment buildings are exempt from the building thermal envelope provisions.

The NYS Executive Order No. 111 provides the guidelines for energy use and environmental issues for New York State buildings and vehicles. While this Executive Order would not apply to Private Industry, it represents an Energy Conservation Model recognized within the state that can be referenced by private industry. Some of the goals are to increase the availability of renewable energy sources and premium efficiency products, reducing peak summer energy demand and creating a less oil dependent economy. For new construction equal to or greater than 20,000 gross square feet, the building must achieve at least a 20% improvement in energy efficiency performance, meet the criteria for a U.S. Green Building Council Leadership in Energy and Environmental Design (LEED) rating, and comply with the New York State Green Building Tax Credit requirements.

The following incentives are available to industry within NYS with a clear intent to promote and reward the use of energy efficient systems and policies. Several are available to industry located within Onondaga County and are promoted and coordinated by OCIDA. It is in the best interest of any industry locating at the expanded Park to be as energy efficient as possible to control operating costs as well as contribute to achievement of NYS initiatives and energy objectives. New facilities systems are expected to be designed to be highly energy efficient using the latest technologies in energy use and conservation which represent the most cost effective and responsible approach for the industry.

OCIDA coordinates incentive packages for businesses through the New York State Energy Research and Development Authority (NYSERDA) commercial/industrial programs. These programs provide energy efficiency services for new construction, industrial facilities and vehicle fleets. NYSERDA services



include new renewable, clean energy and energy efficient product manufacturing incentives and services designed to promote greater transportation, lighting and HVAC efficiencies.

Energy Star is a voluntary partnership program of the U.S. Environmental Protection Agency (EPA). Its primary purpose is to help U.S. industry improve its competitiveness through increased energy efficiency and reduced environmental impact. Through Energy Star, the U.S. EPA encourages strong and strategic corporate energy management programs and provides energy management tools and strategies to assist companies implement such programs. There are several methods for designers, contractors, and building managers to be recognized by the EPA. The most notable is the Energy Star Building Certification which requires the building to meet strict energy performance standards set by EPA. These standards include energy performance indicators (EPIs) to calculate energy intensity and to score the facility on a 1-100 scale. A score of 75 or above is required for certification, but certification is not available for all building types and for all sectors of industry. For a building in the design phase, there is the Designed to Earn Energy Star Recognition, which signifies that the operating energy use of the building is designed to be in the top 25 percent as compared to similar buildings throughout the U.S. Industrial and manufacturing facilities that are not part of EPA's Industries of Focus are eligible to participate and receive Energy Star's Challenge for Industry Recognition which is designed to help energy managers and industrial sites improve energy performance and set goals. Industrial sites participate by committing to the pre-established goal of improving energy performance by 10 percent within 5 years or less.

Currently, semiconductor manufacturing, including, but not limited to wafer fabrication and processing, is not eligible for an Energy Star Building Certification, but can be recognized through both the Designed to Earn Energy Star Recognition and Challenge for Industry Recognition. These programs offer advanced tools to assist manufacturers in assessing and tracking energy use and prescribing energy management and improvement initiatives with goals of energy reduction. Achievement of set energy reduction and environmental improvement goals results in receiving recognition.

Unstable energy markets, increasing competition, and global regulation of greenhouse gas emissions are currently causing many U.S. manufacturers to implement energy management as a viable opportunity. A reduction in production cost can be achieved without negatively affecting the yield and quality of products by effectively reducing energy consumption and costs. This goal can often be met through investments in energy efficiency, which can include the implementation of plant-wide energy-efficiency practices and the purchase of energy-efficient technologies. These technologies can often offer additional benefits, such as quality improvement, increased production, and increased process efficiency.

OCIDA promotes State and Federal incentives to encourage users to develop the Park with energy systems that are both energy efficient and environmentally friendly. This can be accomplished through the planning, design and construction of facilities that are consistent with Leadership in Energy and Environmental Design (LEED) certification standards. Standards include energy efficient heating, ventilation and air conditioning (HVAC) systems, and day-lighting of interior spaces.



## Solid Waste Management

As a result of the proposed Park expansion, there is a potential for increased generation of solid and hazardous wastes, which represents a change from what was considered in the 2013 FGEIS. The impact will not be significant in terms of total service area and capacity. It is anticipated that local haulers will provide adequate services to the Park, as is currently being provided to other businesses and industrial users in the County. No additional mitigation is necessary since potential impacts due to solid waste generation are minimal.

OCIDA will work with any future tenants to develop a solid waste management program that includes recycling and reuse of materials. Management and disposal of solid waste will be consistent with the goals established by the Onondaga County Resource Recovery Agency (OCRRA) in its September 2016 Solid Waste Management Plan Update. It is anticipated that a Project site developer will institute measures to reduce solid waste generation, reuse materials (where possible), and institute recycling measures. These “best-management” practices are cost-effective alternatives to offsite disposal.

Transportation and disposal of non-hazardous solid waste will be coordinated with a licensed solid waste hauling firm. It is anticipated that material will primarily be taken to OCRRA’s Waste to Energy Facility in Jamesville or an approved transfer station. OCRRA also has contingency plans for disposal of waste, if necessary, at facilities such as Seneca Meadows Landfill (Seneca County) or High Acres Landfill (Monroe County). Future development and operations within the Park will be required to comply with Chapter 194 of the Town’s Solid Waste Code.

Manufacturing activities at the expanded Park could include the use and storage of petroleum, compressed specialty gases, and chemicals such as paints, solvents, chlorine, corrosive materials, and materials contaminated with metals. Specialty gases that may be used or generated by a prospective tenant could include nitrogen, nitrogen trifluoride, oxygen, carbon dioxide, silane, nitrous oxide, helium, and argon. Various types of hazardous waste may be produced as a result of the potential manufacturing activities that could take place at the expanded site. It is possible that up to approximately 60,000 tons of hazardous waste could be generated per year. Hazardous waste could be in solid, liquid or gaseous forms and is considered hazardous because of its physical characteristics or the process that generated the waste. Potential waste streams may include solvent wastes, isopropyl alcohol, acids, hydrogen fluoride, ethylene glycol, chlorine, wastewater sludge, metal slurries, and metal plating wastes. Hazardous waste that is generated, treated, and stored is controlled by permits and regulations administered by NYSDEC and USEPA, under the Resource Conservation and Recovery Act (RCRA). Off-site disposal of hazardous waste would be coordinated with a licensed hazardous waste hauler and one or more permitted treatment/disposal facilities. Permitted facilities in New York State that accept hazardous waste include Chemical Waste Management - Model City (Niagara County) and Durez Corporation (Niagara County). Alternatively, hazardous waste may be transported out-of-state using private vendors.

Various types of hazardous materials may be produced a result of the potential manufacturing activities that could take place at the proposed expanded Park. Generation of waste products has the potential to create a small to moderate impact if not handled properly and in accordance with State and Federal regulations. However, any such impacts will be mitigated through the use of engineering controls, staff



training, best-management practices, and regulatory compliance with State/Federal permits, laws and regulations will be instituted.



## 1.0 INTRODUCTION AND PROJECT DESCRIPTION

### 1.1 Project Background

#### 1.1.1 Project Description

The Onondaga County Industrial Development Agency (OCIDA) proposes to expand its existing White Pine Commerce Park (“Park”), formerly known as the Clay Business Park. The Park is located northeast of the intersection of NYS Route 31 and CR 49 (Caughdenoy Road) in the Town of Clay, Onondaga County, New York. It was created to be capable of supporting a mix of industrial and/or commercial uses with related office space, advanced state-of-the-art research, large- or small-scale manufacturing, assembly, warehousing, data management, material processing and distribution facilities in a campus-like setting.

OCIDA has devoted substantial time and effort into determining the highest and best use of the Park, with a particular focus on site attributes that will bring high-tech facilities and high paying jobs to Onondaga County. More recently OCIDA has focused its efforts on the semiconductor industry. These efforts have been unsuccessful to date as it has become apparent that a larger geographic footprint is necessary in order to support this type of industry and the associated investment required by the tenant(s).

OCIDA, as Project Sponsor, proposes to expand the Park to approximately 1,250± acres (the “Project” or “Action”). OCIDA currently owns approximately 648± acres, has another 282± acres under contract, and would acquire approximately 320± additional acres. The acreage to be acquired are parcels contiguous to the current Park, and are generally located along Route 31, and along the east and west sides of Burnet Road. OCIDA would acquire the additional parcels through purchase agreements with existing landowners or, if necessary, pursuant to the Eminent Domain Procedure Law (“EDPL”), to avoid fragmented parcels that would hinder future development.

#### 1.1.2 Project Overview and History

In 1991, OCIDA and the Syracuse Chamber of Commerce commissioned an Industrial Park Feasibility Study to identify potential candidate sites for locating industrial businesses in Onondaga County. The feasibility study identified two primary candidate locations for large-scale industrial uses, one in the Town of Lysander north of NYS Route 31 and one in the Town of Clay along NYS Route 31 and Caughdenoy Road. The Lysander site was considered less suitable of the two sites due in part to the presence of substantial wetlands and hydric soil conditions. The Clay site was therefore chosen by OCIDA as the more feasible location for development.

OCIDA acquired seven properties that comprised the then-existing approximately 340± acre Park site along Caughdenoy Road. OCIDA then completed an environmental review under the State Environmental Quality Review Act (“SEQRA”) of the Park and any adjoining routes, rights-of-way and areas needed to support the project at that time, including existing and proposed infrastructure and improvements. This review culminated in preparation of a Final Generic Environmental Impact Statement (2013 FGEIS) and OCIDA’s issuance of a Findings Statement that concluded that the creation and



potential future development of the then existing approximately 340± acre Park avoided or minimized adverse environmental impacts to the maximum extent practicable, and incorporated mitigation measures that were considered practicable.

OCIDA thereafter invested considerable resources in marketing the Park for development. Certain prospective tenants expressed interest in the approximate 340± acre Park over the years but the relatively small size of the current Park was seen as a limiting factor by some. As a result, the Park remains undeveloped. Nevertheless, the Park has many favorable characteristics, including, but not limited to, its proximity to critical utilities and infrastructure, which makes it a very suitable location for large-scale tenants.

This Draft Supplemental Generic Environmental Impact Statement (Draft SGEIS) has been prepared consistent with SEQRA (Article 8 of the Environmental Conservation Law Part 617 of Title 6 of the New York Code of Rules and Regulations). In New York State, most projects of this nature and activities proposed by a state agency or unit of local government, and all discretionary approvals and permits from a state agency or unit of local government, require an environmental impact assessment of a proposed action before such action may be approved, undertaken or funded. SEQRA requires the sponsoring or approving governmental body, in this case OCIDA, acting as SEQRA Lead Agency, to identify, evaluate, and mitigate, to the maximum extent practicable, significant environmental impacts associated with the proposed action. For SEQRA purposes, the term “Project site” used in this document is defined as any location where project facilities and infrastructure will or might be constructed. The Project site includes an expanded Park consisting of approximately 1250± acres and any adjoining routes, rights-of-way and areas needed to support the Project or Project-related mitigation, including existing or proposed infrastructure and improvements. “Off-site” is defined as any portion of the study areas being assessed for potential impacts that are not on or encompassed by the Project site. Because OCIDA previously prepared the 2013 FGEIS for the Park, this Draft SGEIS evaluates the expanded development footprint of the Park and other changes in circumstances that have the potential to result in any new, previously undisclosed, or unevaluated significant adverse impacts.

### 1.1.3 Project Purpose and Need

The Project purpose is to expand the Park to enable OCIDA to market the Park to a larger, more diverse mix of potential industrial and commercial developers by making the Project site more attractive to a broader scope of industries, particularly the semiconductor industry, and bringing high tech and high paying jobs to Onondaga County.

This Draft SGEIS identifies, evaluates and addresses various impact thresholds, permit criteria and mitigation measures anticipated for the expanded Park, including those attributes associated with large-scale semiconductor industrial development. By addressing these issues in a Generic EIS format, the SEQRA process will define a set of threshold conditions or criteria under which potential future actions and development will be undertaken or approved, including any subsequent SEQRA compliance requirements.





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This statement has no bearing on the environmental impact of the project.



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Concur.



#### 1.1.4 Project Location and Setting

The Park is located at the northeastern corner of the intersection of NYS Route 31 and Caughdenoy Road in the Town of Clay, Onondaga County, NY (see Figure 1.1-1). The Park is approximately 7 miles north of the City of Syracuse.

The Park is accessible from major nearby interstates. This includes Interstate 81 (I-81) via Exit 30 at NYS Route 31 in Cicero, approximately 2.2 miles east of the Project site. The I-81/I-481/NYS Route 481 interchange is four miles southeast of the project. The NYS Route 481/NYS Route 31 interchange is approximately 3.5 miles west of the Park. The New York State Thruway (I-90) is about 6.5 miles south of the Park. Syracuse Hancock International Airport is about 5 miles south of the Park located along the I-81 corridor.

The Park is located in the eastern portion of the Town of Clay, adjacent to the Town of Clay/Town of Cicero boundary. The Town of Clay is a northern suburb of the City of Syracuse. Clay is the largest town in Onondaga County occupying approximately 48 square miles with a 2019 Census population of 59,250 people. The population of the Town has remained largely unchanged over the past two decades decreasing 0.84% since 1990. The area surrounding the Park is sparsely populated with relatively low-density residential development mostly along Caughdenoy Road and Verplank Road west of the Park, Mud Mill Road north of the Park and Burnet Road within and near the eastern boundary of the Park. I-81 is located a little more than one mile to the east of the site.

Residential and commercial development in northern suburbs of Onondaga County is likely to continue, according to the most recent studies conducted by the Town of Clay, the Syracuse-Onondaga County Planning Agency (SOCPA), and the Syracuse Metropolitan Transportation Council (SMTTC). These studies include a corridor study conducted in 2010 by the SMTTC titled *Clay-Cicero Route 31 Transportation Study*, the *Town of Clay Northern Land Use Study* prepared in 2013, and the *2010 Development Guide for Onondaga County*. New residential development has occurred south and east of the Park, primarily along the NYS Route 31 corridor in the Town of Cicero. The Town of Cicero had a 2019 population of 30,721 people, a decrease of 2.89% since 2010.

The SOCPA, SMTTC, and Town of Clay studies assume future growth in the project area and account for future industrial use of the Park.

#### 1.1.5 Proposed Development

The 2013 FGEIS detailed a preferred development scenario, which anticipated a full build-out of approximately 2.0 to 2.5 million square feet of industrial development and assumed that the Park would be developed in several phases over the course of perhaps 10 to 15 years. Specifically, the 2013 FGEIS considered a full build out scenario of the Park in three development areas. Given the lack of any specific tenant and uncertain timing for development of future phases, this Draft SGEIS considers the potential impacts associated with the development of the Park, including the expanded area, while providing for further evaluation, as necessary, when a conceptual plan for a specific development is available.

The development evaluated in this Draft SGEIS contemplates OCIDA's focus on developing the expanded Park with a tenant or tenants in the semiconductor industry. This may translate into a buildout





encompassing approximately 4.0 million square feet of industrial development at the Park. This would equate to approximately 400 acres of surface disturbance (temporary and permanent) within the Park developed in a campus like setting that would be sited to avoid regulated wetland areas and would limit the height of structures to no more than 160 feet. This anticipated development is expected to bring approximately 4,000 jobs covering three shifts that operate 24/7 year-round.

Based on a review of similar types of facilities being developed in other areas of the country, and given existing site conditions and the Project purpose, the buildout would likely include the following:

- A combined total of approximately 4.0 million square feet (SF) of buildings in a campus like setting made up of the type of uses identified in the 2013 FGEIS (manufacturing, laboratory, R&D, fabrication, warehousing, office, support, utility, waste, service yards, energy, water treatment);
- Approximately 50 acres of paved area for parking (which may include parking garages), loading, internal road circulation and/or shipping/receiving areas;
- Two (2) access roads entering the Project site from NYS Route 31 and Caughdenoy Road;
- Approximately seven miles of new sanitary sewer line from the Oak Orchard WWTP to service the surrounding sewer district, including the Park;
- Approximately four miles of new gas lines to the Park
- Approximately 5,000 linear feet of underground electric lines to the Park
- Areas undeveloped and set aside for greenspace, wetland preservation, conservation, and if necessary, mitigation;
- Additional areas for:
  - Stormwater management
  - Truck scales and security guard stations
  - Fuel storage
  - Employee amenities, trails and open space
  - Landscaping, security fencing, signage, earthen berms and vegetated buffers.

Project development will include site infrastructure consisting of internal roads, drainage culverts, waterlines, sewer and wastewater systems, electric, natural gas, stormwater management systems, lighting, landscaped areas, earthen berms and areas maintained as undeveloped natural buffers. It is anticipated that areas owned by OCIDA that are north of existing New York Power Authority (NYPA) and National Grid transmission lines will not be developed to avoid actual or potential wetland areas. Upland areas alongside these wetlands may be suitable as possible wetland mitigation areas, if necessary, for potential impacts that cannot be avoided or minimized by a future specific development, which is not covered by this Draft SGEIS.

The development of the Park will occur south of the National Grid/NYPA transmission lines and avoid most of the eastern portion of the Project site due to the likely existence of wetlands and wetland buffer areas. This area includes approximately 732± total acres of prime developable land within the Park. See Figure 1.1-2. This area has been identified as the prime developable area due to the anticipated absence of wetland features, the generally flat topography, and the access to the surrounding transportation network and potential access points along NYS Route 31 and Caughdenoy Road. The prime developable area within the Project site is also positioned away from the overhead transmission lines, which run across the northern portion of the Project site. The proposed gas line and sewer connection would also tie



directly into this portion of the Project site with limited, if any, impacts to wetlands or other natural features anticipated.

## 1.2 Changes in Circumstances

### 1.2.1 Expanded Scope of Potential Uses

The 2013 FGEIS envisioned a Park that would accommodate a mix of industrial uses which could include office, research, manufacturing, assembly, warehousing and distribution facilities in a campus environment. It similarly noted OCIDA's intent to market the Park "for various types of uses possibly including advanced manufacturing, material processing, product assembly, warehouse and distribution, research and development, and data management to facilitate the creation of high-paying employment opportunities in Onondaga County." (FGEIS Section 1.2).

OCIDA now seeks to market the Project to a larger, more diverse mix of potential industrial and commercial developers by making the Project site more attractive to a broader scope of industries. The expanded Park will be capable of supporting a mix of industrial and/or commercial uses with related office space, advanced state-of-the-art research, large- or small-scale manufacturing, assembly, warehousing, data management, material processing and distribution facilities in a campus-like setting. As such, OCIDA intends to market the Project site in a more targeted manner to the semiconductor industry.

### 1.2.2 Expanded Footprint

In 2013, the Park consisted of seven contiguous parcels covering a total area of approximately 340± acres of land and under the control of OCIDA (see FGEIS Fig. 1.4-1). At that time, the Park consisted of large undeveloped areas of former farmland, vacant fields, shrubland and woodlands, all of which are in various stages of natural succession. The northern portion of the Park included several areas of mapped wetlands and small drainages that drain northward under existing NYPA and National Grid electric transmission lines towards Youngs Creek, a non-navigable stream located north of the Park. These transmission line rights-of-way cross the northern one-third of OCIDA Park in an east-west direction perpendicular to Caughdenoy Road. The transmission lines originate at the National Grid Clay electrical substation just west of the Project site. An existing CSX rail line crossed the northwestern corner of the Park generally in a northeast/southwest direction. There was an at-grade railroad crossing along Caughdenoy Road adjacent to the Park.

In order to attract targeted development, OCIDA now proposes to expand the footprint of the Park to approximately 1,250± acres. OCIDA currently owns approximately 648± acres, has another 282 acres under contract, and would acquire approximately 320± additional acres. The acreage to be acquired are parcels contiguous to the current Park, and are generally located along NYS Route 31, and along the east and west sides of Burnet Road. OCIDA would acquire the additional parcels through purchase agreements with existing landowners or, if necessary, pursuant to the EDPL, to avoid fragmented parcels that would hinder future development.



### 1.2.3 Changes in the Surrounding Area

The land use patterns within the vicinity of the Park have not changed substantially since the completion of the 2013 FGEIS, although there has been limited new residential development near the Park. New residential developments near the Park include the Tocco Villaggio Apartments and the residential community of Appaloosa Trail. The Tocco Villaggio Apartments added new residential units as well as expanded residential streets off of NYS Route 31 towards the southeastern corner of the Park. The Appaloosa Trail residential community, located to the west of the Project site near Van Hoesen Road, added several new single-family homes since the 2013 FGEIS.

Additionally, a 60-unit senior housing complex along Brewerton Road east of the Park was recently approved by the Town of Clay Planning Board but has not been constructed. There is a mixed use Planned Development District (PDD) on the corner of NYS Route 31 and Henry Clay Boulevard that will soon be presented to the Town of Clay Planning Board for approval. If approved, this new PDD will include approximately 100± apartments and some mixed-use retail units on the bottom floors towards the front of the parcel. These two new developments demonstrate a continuation of, and no material change to, the land use patterns within vicinity to the Park.

Since the preparation of the 2012 TIS that was part of the 2012 DGEIS and finalized in the 2013 FGEIS, traffic roadway changes include:

- The addition of exclusive eastbound and westbound left turn lanes along NYS Route 31 at Henry Clay Boulevard.
- The unsignalized intersections of NYS Route 31/Caughdenoy Road and NYS Route 31/Legionnaire Drive/Lawton Road were signalized.
- The Caughdenoy Road/NYS Route 31 intersection was also recommended for right and left turn lane additions; however, the current development assumptions have changed with multiple site entrances.

### 1.2.4 Potential Acquisition of Parcels Pursuant to the EDPL

At the time of the 2013 FGEIS, OCIDA owned the seven parcels that comprised the approximate 340± acre Park. Since that time, OCIDA has acquired additional parcels and will continue to do so. However, it is anticipated that OCIDA may not be able to acquire through voluntary purchase agreements all of the parcels necessary to expand the Park's footprint as contemplated herein. OCIDA, therefore, may need to acquire certain parcels pursuant to the EDPL.

### 1.2.5 Climate Change

Since the completion of 2013 FGEIS, the Climate Leadership and Community Protection Act (CLCPA) was passed and signed into law in 2019 (Chapter 106 of the Laws of 2019). The CLCPA and Environmental Conservation Law ("ECL") Article 75 require NYSDEC to promulgate regulations to establish a statewide greenhouse gas ("GHG") emissions limit for 2030 that is sixty percent of 1990 GHG emissions, and for 2050 that is fifteen percent of 1990 GHG emissions. The CLCPA also requires the Public Service Commission ("PSC") to establish a program to meet a target of seventy percent of



statewide electrical generation from renewable sources by 2030, and a target of zero GHG emissions for statewide electrical demand by 2040. NYSDEC adopted 6 NYCRR Part 496 on December 30, 2020, which established the statewide GHG emission limits for 2030 and 2050 consistent with ECL Article 75 and the CLCPA. On October 15, 2020, the PSC issued an Order expanding the Clean Energy Standard to increase renewable energy in the state to 70% by 2030. In addition to the regulations, Section 7(2) of the CLCPA requires all state agencies to consider whether the decision to issue permit(s) is inconsistent with or will interfere with the attainment of the ECL Article 75 GHG emission limits.

## 1.3 Permitting and SEQRA Process

### 1.3.1 State Environmental Quality Review Act

Pursuant to regulations promulgated under SEQRA, all state, regional, and local government agencies are to consider potential environmental impacts equally with social and economic factors during preliminary stages of proposed development actions. The Lead Agency and other Involved Agencies must assess the environmental significance of all actions they have discretion to approve, fund, or directly undertake.

Under SEQRA, a Generic Environmental Impact Statement (GEIS) 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 site design become known. It is appropriate to conduct an environmental review of the Project as a GEIS because the Project’s development scenario offers a reasonable prediction of anticipated development while preserving flexibility to accommodate various industrial uses, buildings and facilities, scales of development and site design.

The SEQRA process provides guidance on the preparation of a GEIS and the coordinated review of subsequent actions. According to 6 NYCRR Part 617.10(c) of SEQRA:

*“Generic EISs and their findings should set forth specific conditions or criteria under which future actions will be undertaken or approved, including requirements for any subsequent SEQRA compliance. This may include thresholds and criteria for supplemental EISs to reflect specific significant impacts, such as site specific impacts, that were not adequately addressed or analyzed in the generic EIS.”*

Subsequent chapters of this Draft SGEIS will identify, evaluate and provide information on avoiding, minimizing, and mitigating potential environmental impacts resulting from development of the Park as defined in this document. The Draft SGEIS establishes a set of conditions and thresholds describing the site, project components and environmental impacts potentially associated with the Project site’s development. Future development proposals for the Park are expected to be generally consistent with the scale and distribution of facilities as discussed in this Draft SGEIS and with SEQRA Findings that will be prepared subsequent to this Draft SGEIS.





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Fully concur

Future actions that fall within the range of impacts evaluated in the Draft SGEIS are not expected to require further SEQRA review. By identifying baseline environmental conditions and certain impact thresholds, the SGEIS 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 SGEIS and SEQRA Findings. If subsequent proposed actions are not addressed or not adequately addressed in the Draft SGEIS and the subsequent actions will not result in any significant environmental impacts, then SEQRA requires only that a Negative Declaration be prepared. In the event that subsequent proposed actions are adequately addressed in the SGEIS, but not adequately addressed in the Findings Statement, an amended Findings Statement will be prepared.

However, if any components associated with future development of the Park do not fall within the set of conditions and criteria defined or anticipated by this Draft SGEIS, another supplement to the Final SGEIS may need to be prepared to further evaluate and identify mitigation of significant adverse environmental impacts associated with specific development proposals that are inconsistent with this SGEIS.

SEQRA requires a supplement to the Final GEIS (a Supplemental EIS) if:

*“...the subsequent proposed action was not addressed or was not adequately addressed in the generic EIS and the subsequent action may have one or more significant adverse environmental impacts.”*

As future development is proposed for the Park, the Lead Agency established at that time under SEQRA for each proposed action will be responsible for evaluating the guidance contained at 6 NYCRR Part 617.10 regarding the need for further SEQRA compliance measures.

### 1.3.2 Chronology of Previous Environmental Reviews

In 2012, OCIDA undertook an environmental review of the Park. As part of the prior environmental review for the Park, on March 6, 2012, OCIDA established itself as the Lead Agency under SEQRA and assumed the responsibilities for conducting the coordinated environmental review. OCIDA determined that the project was a Type 1 action requiring preparation of an EIS. As specific tenants and uses within the Park were unknown at that time, OCIDA prepared a GEIS to analyze potential environmental impacts of the project. OCIDA coordinated the SEQRA review for the Park with the other involved agencies.

At the time the GEIS was prepared, the Park was envisioned to consist of a mix of industrial uses that may include office, research, manufacturing, assembly, warehousing, data management, material processing and distribution facilities in a campus-like setting. OCIDA intended to develop the Park for advanced manufacturing and state-of-the-art industrial uses to facilitate the creation of high-paying employment opportunities in Onondaga County.

A draft scoping document was prepared and made available for comment. Following a public comment period, OCIDA issued a Final Scoping Document which identified potential impacts and anticipated impacts to be addressed in the GEIS.



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Concur; however, the development agency is the lead agency. Those thresholds may be very one-sided.

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Concur

A Draft GEIS (“DGEIS”) was prepared and accepted as complete on September 20, 2012 and made available for public comment. The DGEIS evaluated the potential impacts of the proposed multi-use industrial park, envisioning a certain setting which included, but was not limited to:

- The Park would encompass a certain footprint, accommodating approximately 2 million sq. ft. of multi-use space without adverse impact.
- The Park would accommodate uses such as manufacturing, research and development, warehousing, assembly, office, distribution facilities, associated parking, and other on-site support buildings and structures.
- The Park would maintain greenspace to protect wetlands and avoid impacts.
- Anticipated installation of underground utilities and infrastructure for on-site use (i.e. gas and electric utilities, water and sewer infrastructure).
- Off-site improvements such as highway and road improvements, wastewater treatment infrastructure improvements, and water supply infrastructure improvements.
- Tenants would obtain site or facility-specific permits, such as air permits and non-sanitary sewer discharge permits, as necessary for facility-specific operations.

A Public Hearing on the DGEIS was held on October 16, 2012, and the public comment period ended on October 29, 2012. Subsequently, a Final GEIS (“FGEIS”) was prepared by OCIDA and accepted as complete on September 10, 2013. OCIDA thereafter issued its Findings Statement on October 8, 2013. OCIDA concluded that the action avoided or minimized adverse environmental impacts to the maximum extent practicable, and incorporated mitigation measures that were considered practicable.

### **1.3.3 Chronology of Current SEQRA Process**

OCIDA prepared a Full Environmental Assessment Form (“EAF”) for the Project to supplement its prior SEQRA review of the Park. On December 8, 2020, based on an examination of the FEAF, the criteria contained in 6 NYCRR §617.7(c), and its knowledge of the area surrounding the Project site, OCIDA adopted a resolution classifying the Project as a Type I action, declared its intent to act as lead agency for the purpose of conducting a coordinated environmental review, determined that the Project has the potential to result in at least one significant adverse impact, and issued a positive declaration for the Project. Additionally, OCIDA determined that the Project represents a significant change from the Park’s current footprint and that there exists other changes in circumstances from those previously evaluated in the 2013 FGEIS. As a result, OCIDA concluded that the preparation of a Supplemental GEIS (“SGEIS”) is necessary to adequately identify and evaluate potential significant adverse impacts associated with the Project that are not addressed or are inadequately addressed in the 2013 FGEIS. To that end, OCIDA adopted and issued a Notice of Intent to Serve as Lead Agency and Prepare a Draft SGEIS (“Notice of Intent”) for the Project, which was subsequently filed and distributed in accordance with SEQRA.

The Full EAF provided a description of the Project, identified agencies that have potential permitting and approval jurisdiction over the Project, and identified potential environmental impacts. The Project (or





Proposed Action) remains classified as a Type 1 Action for the purposes of this supplemental environmental review because the Project (Part 617.4.(b)(7)).

A copy of the FEAF and the Notice of Intent are found in Appendix A.

OCIDA received concurrence from the Onondaga County Water Authority (OCWA) and from the New York State Department of Environmental Conservation (NYSDEC) for OCIDA to act as the Lead Agency for the purpose of conducting a coordinated environmental review of the Project under SEQRA for the proposed expansion of the Park. All other identified Involved Agencies did not object to OCIDA's lead agency declaration within the statutory time period. A copy of the lead agency correspondence is found in Appendix A.

The list of Involved and Interested Agencies identified for the Project is provided as follows:

- Onondaga County Department of Transportation (OCDOT)
- Onondaga County Department of Health (OCDOH)
- Onondaga County Department of Water Environment Protection (OCDWEP)
- Onondaga County Water Authority
- Onondaga County Industrial Development Agency
- Syracuse Metropolitan Transportation Council (SMTC)
- New York State Department of Transportation (NYSDOT)
- New York State Department of Environmental Conservation (NYSDEC)
- New York State Office of Parks, Recreation and Historic Preservation (NYS OPRHP)
- United States Army Corps of Engineers (USACE)
- United States Fish and Wildlife Service (USFWS)
- Town of Clay Town Board
- Town of Clay
- Town of Clay Zoning Board of Appeals
- Town of Clay Planning Department
- Syracuse Onondaga County Planning Agency
- Town of Cicero

Additional agencies and stakeholder organizations that may participate in the review process include, but are not limited to:

- New York Power Authority
- National Grid
- CSX Rail
- New York Empire State Development

### ***GEIS Preparation***

This Draft SGEIS has been prepared in accordance with 6 NYCRR 617.9, as applicable to a supplemental assessment. As such, it presents a focused assessment of potentially significant adverse impacts associated with the Project and changes in circumstances that have occurred since the 2013 FGEIS and Findings Statement. The 2013 FGEIS will be appended by reference.



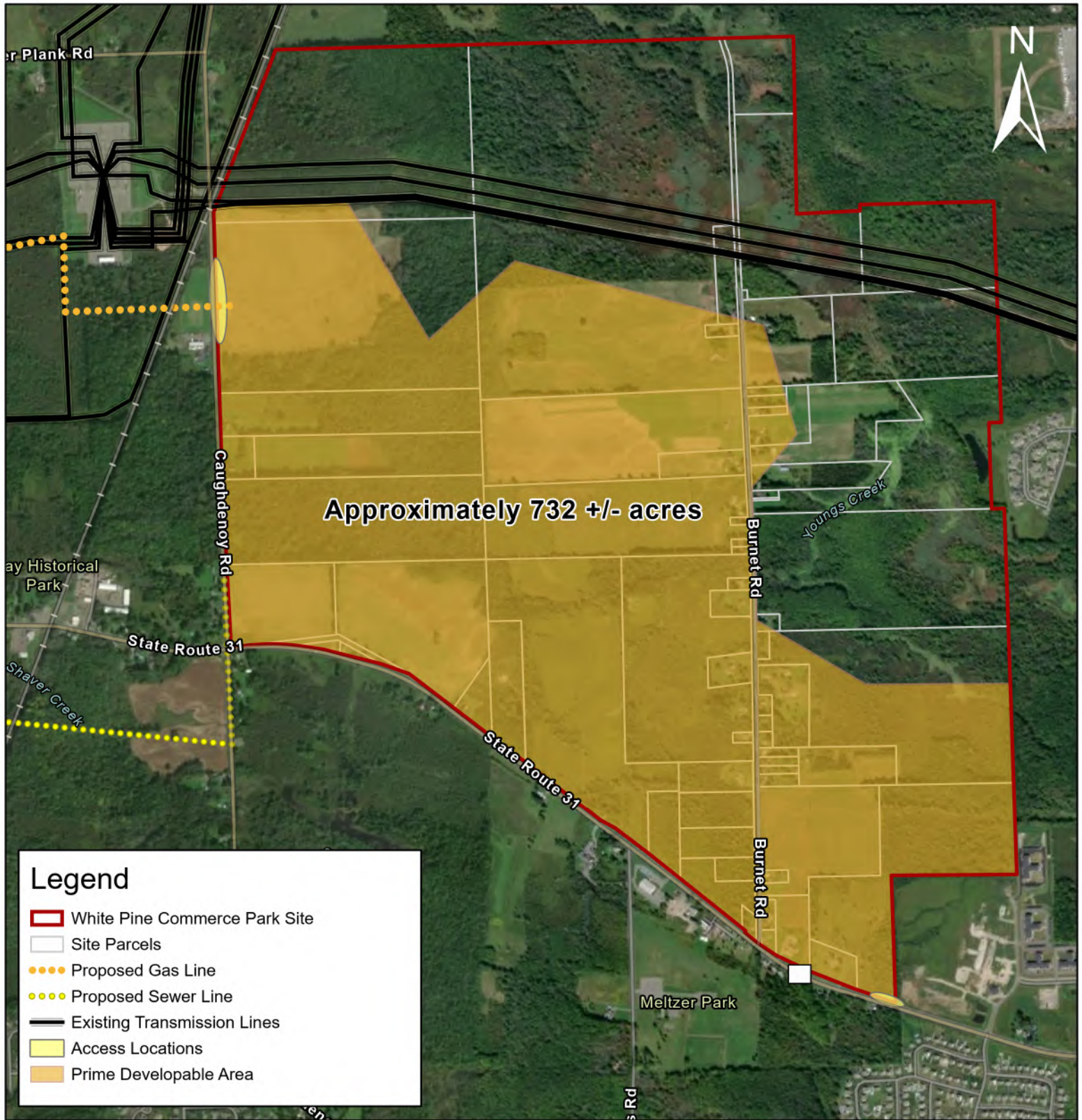
### ***Required Approvals and Permits***

The potential future development of the Project site is anticipated to require specific approvals and permits during various stages of planning, design, and site development. Many permits and approvals to be issued by Involved Agencies, such as highway work permits from State or County DOTs, will be sought after actual site development plans have been prepared and advanced to the point that specific industrial tenant requirements and project components become known. Project reviews, approvals and permits which may be sought from various agencies include, but are not limited to the following:

- NYSDEC Air Permit (type depending on future tenant(s))
- NYSDEC Threatened & Endangered Species
- NYSDEC Freshwater Wetlands
- NYSDEC 401 Water Quality Certification
- U.S.A.C.E. Section 404 (Waters of the United States)
- Discharge to Surface Water (NYS PDES) 6NYCRR Part 750
- General Permit for Stormwater Discharge from Construction Activity SPDES GP-0-10-001
- Multi-Sector General Permit for Stormwater Discharge Associated with Industrial Activity SPDES GP-0-06-002
- NYSDOT Highway Work Permit (I-81 & NYS Route 31)
- Onondaga County Planning Referral GML 239m
- Onondaga County Department of Water Environment Protection Industrial Waste Discharge Permit
- County Highway Department Work Permit
- County Highway Department Curb Cut Approval
- Town of Clay Subdivision Adjustment (Section 230-28F)
- Town of Clay Planned Development District (PDD) / Zone Change
- Town of Clay Site Plan Review & Approval (Section 230-26)
- Town of Clay Industrial Performance Standard Variance (Section 230-17)
- Town of Clay Accessory Special Permit
- Town of Clay Building Permit
- Town of Clay Certificate of Occupancy
- Town of Clay Demolition Permit







## Legend

- White Pine Commerce Park Site
- Site Parcels
- Proposed Gas Line
- Proposed Sewer Line
- Existing Transmission Lines
- Access Locations
- Prime Developable Area



Figure 1.1-2

## Prime Developable Area

White Pine Commerce Park  
Onondaga County Industrial Development Agency

Date Printed: 4/26/2021

Data Sources: Onondaga County Parcel Data provided by SOCPA  
New York State, Maxar, Esri Community Maps Contributors, Esri Canada, Esri, HERE,  
Garmin, SafeGraph, INCREMENT P, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA

0 0.13 0.25 Miles

Scale: 1 inch = 2.5 miles







## 2.0 ALTERNATIVES

### 2.1 Background

Several alternatives were fully evaluated in the 2013 FGEIS. This section updates those that have changed and expands upon others as necessary to account for the proposed expansion of the Park. These alternatives include: no action (Alternative 1); considering the Park as it was originally proposed in the 2013 FGEIS (Alternative 2); utilizing a smaller expanded area – less than the approximately 1,250± acres (Alternative 3); and considering a different location to site the Park (Alternative 4).

### 2.2 Alternative 1: No Action Alternative

#### 2.2.1 Description

The no action alternative would retain the current vacant, undeveloped conditions of the Park.

#### 2.2.2 Comparison of Potential Environmental Impacts from Alternative 1 to the Project

As described in the 2013 FGEIS, the no action alternative would result in the Park remaining open space and potential habitat for common wildlife that is inaccessible and unutilized by the community until it is sold and used for other purposes. This alternative would avoid the potential need to acquire lands pursuant to the EDPL to further expand the lands owned by OCIDA to support future development. See 2013 FGEIS (Draft Section 2.1) for further analysis of this alternative.

#### 2.2.3 Limitations of Alternative 1

As discussed in the 2013 FGEIS (Draft Section 2.1), the no action alternative would adversely affect Onondaga County's ability to remain competitive in attracting large-scale industries to Central New York. The no action alternative would preclude potentially beneficial economic impacts associated with the Project, including an increase in employment opportunities and enhanced tax revenues.

Also, as previously disclosed in the 2013 FGEIS (Draft Section 2.1), current investment in the site may be lost with this alternative, as site conditions change over time. This could decrease the future development potential of the site due to increased costs associated with vegetation clearing and changing drainage characteristics, which may affect the use of additional acreage. The completed technical studies would also be less useful as data and recommendations become increasingly outdated. Alternative 1 would also preclude a comprehensive plan of development that includes measures to avoid and minimize impacts to ecological resources versus potential piecemeal, and uncoordinated separate developments that would not consider the larger area that the Park encompasses.

#### 2.2.4 Conclusion

The no action alternative is not an acceptable alternative to the Project, as it is contrary to OCIDA's mission to facilitate industrial development and job creation in Onondaga County.



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Economic impact is not a consideration in the SEQR review process and cannot be used in the weighing of alternatives.

Definition of Environment, 6 NYCRR 617.2:

(l) Environment means the physical conditions that will be affected by a proposed action, including land, air, water, minerals, flora, fauna, noise, resources of agricultural, archeological, historic or aesthetic significance, existing patterns of population concentration, distribution or growth, existing community or neighborhood character, and human health.

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Concur. A comprehensive plan for the area would be ideal, with development, forever wild, and educational/nature park alternatives to be equally considered.

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concur. It is OCIDA's to "facilitate industrial development and job creation in Onondaga County"

## 2.3 Alternative 2: The Park as Considered in 2013 FGEIS

### 2.3.1 Description

The Park as it is considered in the 2013 FGEIS alternative would encompass approximately 339+/- acres within the western portion of the current Park area.

### 2.3.2 Comparison of Potential Environmental Impacts from Alternative 2 to the Project

This alternative would keep the size of the Park to 339+/- acres, which is roughly 911+/- acres smaller than the currently proposed 1,250+/- acre expanded Project site. Although potential environmental impacts would be limited to a smaller area, impacts on certain resources, such as wildlife may potentially be greater, as sectional development could significantly fragment essential wildlife habitat. The main wildlife mitigation for the Park is to retain/maintain existing habitat tracts, and when not feasible, use compensatory mitigation to include creation or enhanced restoration of habitat to account for any habitat loss. With a smaller park size, it would be difficult to achieve both objectives, including on-site compensatory mitigation due to space limitations. This alternative would avoid the potential need to acquire lands pursuant to the EDPL to further expand the lands owned by OCIDA to support future development.

In addition, depending on an actual tenant(s), a smaller sized Park may not reduce certain environmental impacts such as traffic, visual, air and noise. Instead, it could just reduce the size of open greenspace incorporated into any development design and potentially cause greater wetlands disturbance. In contrast, the preferred alternative would allow future tenants additional acreage on-site sufficient to construct necessary buildings and accessory uses while avoiding impacts to ecological resources such as wetlands to the maximum extent practicable.

### 2.3.3 Limitations of Alternative 2

OCIDA has marketed the existing approximately 339-acre Park since 2013 and determined that the current Park is too small for the type of development it desires to attract to the area and consistent with other industrial park developments in other areas of New York and the country. The smaller, approximate 339-acre footprint would not allow for the potential of larger industrial and commercial developers, such as the semiconductor industry. The proposed expanded footprint of the Park allows OCIDA to market to a larger, more diverse mix of industries than it had previously. The smaller sized park would not support the main objective, which is to attract a broader scope of industries such as the semiconductor industry, which require a large campus setting with greenspace and ample buffering from environmental receptors and would bring high tech and high paying jobs to Onondaga County.

### 2.3.4 Conclusion

While the Park as it is considered in the 2013 FGEIS alternative would avoid the potential to acquire lands, if necessary, pursuant to the EDPL, it is not a viable option as it would greatly limit the full economic and development potential of the Project site in terms of viable tenants, occupancy and use, and limit options for avoiding and mitigating potential adverse environmental impacts.



- H** Author:Dennis R. Roote, P.E. Subject:Highlight Date:6/3/2021 3:48:04 PM  
What and where are those habitat tracts? are they restricted to the wetlands or do they encompass other locations within the park?
- H** Author:Dennis R. Roote, P.E. Subject:Highlight Date:6/3/2021 3:54:36 PM  
This is a statement of false equivalence. Regardless of size of development, the wetlands will remain undisturbed/undeveloped. Decreasing the size of the development does not circumvent NYSDEC and ACOE wetlands regulations.
- H** Author:Dennis R. Roote, P.E. Subject:Highlight Date:6/3/2021 3:56:15 PM  
Those buffers and greenspace are functions of NYSEC/ACOE regulations as well as local planning/zoning ordinances.



## **2.4 Alternative 3: Smaller Expansion**

### **2.4.1 Alternative 3 Description**

The smaller expansion alternative would allow for development on only a portion of the Project site, potentially keeping the remainder of the site in its current state, as vacant, undeveloped land or residential homes, and could reduce, or potentially avoid, the potential need to use the EDPL to acquire lands.

### **2.4.2 Comparison of Potential Environmental Impacts from Alternative 3 to Project**

The smaller expansion alternative would have similar environmental impacts as Alternative 2 (The Park as Considered in the 2013 FGEIS) as well as those described in this Draft SGEIS for the Project. As explained above, the potential for habitat fragmentation on the smaller scale project could potentially cause greater impacts to wildlife. Site development would create additional vehicle traffic in the immediate vicinity and would change the visual character, aesthetics, air and noise quality, vegetation and habitats on-site, regardless of the smaller footprint. It also has the potential to reduce the size of open greenspace incorporated into any development design and potentially cause greater wetlands disturbance. The smaller footprint could result in development located closer to residential locations that are not acquired by OCIDA, thus creating greater potential environmental impacts. In contrast, the preferred alternative would allow future tenants additional acreage on-site sufficient to construct necessary buildings and accessory uses, buffer development from adjacent lands, and avoid impacts to ecological resources such as wetlands to the maximum extent practicable.

### **2.4.3 Limitations of Alternative 3**

Although this alternative considers the idea of potentially maximizing development space within a smaller area, much like Alternative 2, the smaller footprint would not allow for the potential of larger industrial and commercial developers, such as the semiconductor industry. The proposed expanded footprint of the Park allows OCIDA to market to a larger, more diverse mix of industries than it had previously. The smaller sized park would not support the main objective, which is to attract a broader scope of industries, such as the semiconductor industry, that require a large campus type setting with greenspace and ample buffering from environmental receptors and would bring high tech and high paying jobs to Onondaga County.

### **2.4.4 Conclusion**

Like Alternative 2, the smaller expansion alternative does not maximize the development potential of the Park and does not expand options for avoiding and mitigating potential adverse environmental impacts. Therefore, it is not an acceptable option.



## **2.5 Alternative 4: Develop Park in Alternative Location**

### **2.5.1 Alternative 4 Description**

This alternative would consist of the development of the proposed Project at a different location.

### **2.5.2 Comparison of Potential Environmental Impacts from Alternative 4 to Project**

This alternative was previously evaluated and rejected in the 2013 FGEIS (Draft Section 2.2.1). Based on current available information, this conclusion has not changed. None of the previously considered alternative locations would be able to accommodate the large-scale industrial use the Park is promoting due to size limitations and proximity to services and necessary infrastructure. There are no other options available currently that meet the needs of the Project.

### **2.5.3 Limitations of Alternative 4**

Unlike other park locations, the expanded Park can accommodate large-scale industrial tenants that cannot easily locate elsewhere in Onondaga County due to their size and space requirements and need for suitable infrastructure.

Additionally, the other locations do not have the existing utility and transportation services that serve the Park. National Grid's Clay Substation is located adjacent to the Park on the west side of Caughdenoy Road. The Oak Orchard Wastewater Treatment Plant is located approximately 2.5 miles west of the Park. The Park is also bound to the south by a 12-inch water line and NYS Route 31, which is a principal arterial west of Interstate-81, and CSX rail, which is located adjacent to the Park.

### **2.5.4 Conclusion**

Based on the lack of other viable locations within the County to accommodate the intended scale of the Park, as well as OCIDA's substantial investment in the Park to date, this alternative is not a viable option.



## 3.0 ENVIRONMENTAL SETTING

### 3.1 Land Use & Zoning

#### 3.1.1 Land Use

The proposed expanded Park footprint consists primarily of undeveloped land. To the extent development exists, it is limited to residential, commercial, and public utility uses and structures (i.e., electric transmission lines, telecommunications tower) scattered along NYS Route 31 and Caughdenoy Road, with approximately three dozen residences located along Burnet Road. Existing improvements and structures within the expanded Park footprint are located close to existing road frontages, leaving the remainder of the expanded Park in its natural, undeveloped state. The majority of the Park is relatively flat and vegetated with grasses, shrub, and wooded areas that have developed as the area continues to transition from former farmland. Land uses within the proposed expanded Park have remained consistent since the 2013 FGEIS.

The area surrounding the Park was once a rural area comprised of farmland and agricultural uses. The surrounding area is undergoing gradual changes as a more suburban type of development unfolds, primarily along NYS Route 31, but much of the area closest to the Park has maintained a rural character due to large swaths of undeveloped land. While farming activities are conducted within a small portion of the proposed expanded Park, the Park is not located within or near a NYS certified agricultural district.

Land use patterns in the area surrounding the Park have remained largely unchanged since the completion of the 2013 FGEIS, with development consisting primarily of focused residential apartments and communities, specifically the Tocco Villaggio Apartments off of NYS Route 31 east of the Park and the Appaloosa Trail development located west of the Park off of Van Hoesen Road. Additionally, The Town of Cicero Planning Board recently approved a 60-unit senior housing complex to be located on Brewerton Road east of the Park.

The land uses adjacent to the expanded Park include a mix of vacant land, agriculture, residential, commercial, and public utility uses. See Figure 3.1-1 Existing Land Use. The area immediately south of the Park is largely undeveloped with the exception of a few residences and businesses, including a veterinary clinic, church, tractor equipment company, and landscaping business. Farther south of those land uses, suburban residential development is prevalent along Stearns Road and Caughdenoy Road north of I-481. Meltzer Park is also located along Stearns Road. Residential and commercial development also increases to the east of the Park, particularly along NYS Route 31 and Brewerton Road near I-81. The area west of the Park consists of relatively low density residential development with intermittent business and commercial uses, including Jerome Fire Equipment Co on Caughdenoy Road. The density of uses increases heading west along NYS Route 31 near the Town of Clay Town Hall and Great Northern Mall. The area north of the Park is mainly agricultural and vacant land, with some scattered residential uses.

The area adjacent to the expanded Park also includes various public utility and transportation uses. The National Grid Clay substation is located along the west side of Caughdenoy Road. NYPA electric



transmission line rights-of-way and a National Grid line cross the northern third of the Park in an easterly direction from the substation. Additionally, the Watertown branch of the CSX rail line runs diagonally from the northwest corner of the Park southwest across Caughdenoy Road.

As shown in Table 3.1-1, non-residential parcels comprise approximately 71% of existing land use within a one-mile distance from the proposed expanded Park while residential properties comprise about 29% of the area. The primary land use within a one-mile area of the Park is vacant land (38%).

<b>Table 3.1-1: Existing Land Use within One Mile of White Pine Commerce Park</b> (Based on February 2021 Data Provided by SOCPA)			
<b>Land Use</b>	<b># Parcels</b>	<b>Acreage</b>	<b>% Coverage</b>
<b>Residential</b>	<b>2,200</b>	<b>2,405</b>	<b>29%</b>
Apartment	6	30	0%
Single-Family	2,145	1290	16%
Two-Family	11	66	1%
Multi-Family	4	7	0%
Rural Residential	33	998	12%
Home for Aged	1	14	0%
<b>Non-Residential</b>	<b>368</b>	<b>5,812</b>	<b>71%</b>
Agriculture	21	1,022	12%
Commercial	90	913	11%
Industrial/Utility	21	556	7%
Parks/Open Space	9	79	1%
Public Service	19	160	2%
Vacant	208	3,082	38%
<b>Total</b>	<b>2,568</b>	<b>8,217</b>	<b>100%</b>

### 3.1.2 Zoning

The proposed expanded Park is located within the Town of Clay and is subject to the zoning requirements contained in the Town's Zoning Code and the zoning district designations contained in the Town's Zoning Map.<sup>1</sup> Of the proposed expanded Park's approximately 1,250± acres, 346± acres are zoned as Industrial 2 (I-2), 856± acres are zoned Residential Agricultural (RA-100), and 36± acres are zoned One Family Residential (R-15). Burnet Road comprises the remaining 12± acres that make up the expanded Park. As shown in Figure 3.1-2 (located at the end of this Chapter), approximately 850± acres of privately owned land located on Caughdenoy Road west and north of the Park is zoned I-2, with additional parcels zoned RA-100. The parcels directly south of the Park along NYS Route 31 are zoned Highway

<sup>1</sup> Town of Clay Zoning Code (Last Revised May 10, 2016). <https://www.townofclay.org/information/zoning-code>.



Commercial (HC-1) and RA-100. The parcel located adjacent to the southeastern corner of the Park is zoned Planned Development (PDD). The proposed expanded Park's eastern property line is the boundary between the towns of Clay and Cicero. The proposed expanded Park contains multiple zoning designations, not all of which are compatible with the intended future use and development of the Park. The expanded Park will therefore require the approval by the Town of Clay Town Board of either a zone change to I-2 for the portions of the Park that are not zoned I-2 or a PDD that encompasses the entire Park footprint to allow the type of use OCIDA seeks for the Park.

Pursuant to the Zoning Code, the intent of the I-2 district is to:

*“ . . . promote and accommodate processes that primarily operate in a clean and orderly manner that may involve exterior activities sensitive to environmental features and available public services. Other uses are permitted that provide the logistical assembly, shipping, storage, servicing, or similar support for retail or other business uses. This district should be located away from residential districts.”*

The Zoning Code permits the following uses upon receipt of site plan approval from the Planning Board: exhibit hall; wholesale; warehouse; truck terminal; manufacturing; utility substation; emergency vehicle station; building products sale, storage and display; and cropland. The future development and use of the Park as envisioned by OCIDA will therefore require site plan review and approval from the Town of Clay Planning Board and will be subject to any other Town of Clay land use and zoning regulations.

Assuming a zone change to I-2, the future development of the Park must comply with the bulk density and dimensional requirements set forth in the Zoning Code for property within the I-2 district, as set forth below.

#### Lot

- Area, minimum: n/a
- Width, minimum: n/a
- Depth, minimum: n/a
- Coverage, maximum building: 60%
- Coverage, maximum total: 80%

#### Principal structures and attached accessory structures

- Front yard minimum:
  - NYS or county highway: 200 feet
  - Town of private highway: 50 feet
- Side yard minimum: 25 feet
- Rear yard minimum: 25 feet
- Maximum height: n/a
- Maximum gross floor area: n/a
- Maximum number of floors: n/a



Accessory structures, detached

- Front yard minimum: existing principal structure rear line.
- Side yard setback: 25 feet
- Rear yard setback 25 feet
- Maximum height: same as principal structure

Supplemental I-2 district design standards also may apply to the future development of the Park, as outlined below.

- Front perimeter landscape strip must be 50% of front yard depth.
- Additional side or rear yard setbacks of 100 feet where abutting a non-industrial district.
- Structure design, scale and materials:
  - When a new or modified land use and/or structure is proposed on any property that is entirely or partially within 500 feet of a Residential Zone District boundary, then the reviewing board shall also consider the compatibility of the site and building design, scale of site development, and any impacts related to such development with the existing or planned character of those residential zones.
  - Any open storage of materials or waste shall be screened from view from all property lines with a seven-foot high fence, hedge or similar opaque barrier. Such screening shall comply with applicable setbacks.

An alternative to a zone change is the creation of a PDD. Pursuant to the Zoning Code, the intent of a PDD is to allow for:

a variety of land uses and flexible arrangements of lots, structures, and land uses in a well-planned and coordinated design. The flexibility of land uses and lots is achieved by the Town continuously participating in and approving stages of project planning and development. Any combination of land uses already permitted within the Town may be proposed for development on sites under this district. This district is also intended to accommodate land uses or scales of development that may be unique or require more consideration by the Town. This district may be applied anywhere in the Town, provided the project scale and design is found to further Town planning goals and to be compatible and coordinated with the environmental constraints and the existing and/or planned availability of public water, sewer, drainage, and transportation facilities.

It is possible that a PDD could be established for the Park enabling OCIDA, (and/or a potential future developer) and the Town to work collaboratively to customize the development of the Park in ways that are not permitted or feasible in the I-2 district. In such a case, predetermined development standards would not exist and would instead be established jointly with the Town through meetings with the Town Board and Planning Board in accordance with the Zoning Code.



## 3.2 Community Character

The Town of Clay is still the largest suburban town in Onondaga County and is known for its large retail shopping areas and residential neighborhoods. The Town has a diverse economic base, and industrial uses are scattered throughout the Town, including a developed industrial corridor between Henry Clay Boulevard and Morgan Road approximately 5 miles southwest of the Park. The population of the Town along with its pace of development has remained mostly unchanged since the 2013 FGEIS. The character of the area immediately surrounding the Park remains generally rural in contrast to the more developed areas of the Town of Clay and nearby Town of Cicero.

NYS Route 31 represents the primary east-west traffic corridor in the Town of Clay north of I-481 and carries a high volume of traffic between Clay and Cicero. Nearly all travel in the vicinity of the project site is by personal vehicle, which remains unchanged since the 2013 FGEIS. There is little public transit and pedestrian use along major roadways, including NYS Route 31, and the area immediately surrounding the proposed expanded Park lacks sidewalks or other pedestrian facilities (crosswalks, etc.) that would otherwise encourage pedestrian use. While NYS Route 31 is a designated part of New York State Bike Route 5, bicycling activity is not typical along the road or surrounding area. The CSX rail line that provides freight service crosses NYS Route 31 southwest of the Park.

Visually, the western portion of the expanded Park contains few structures or natural features of any significance. The topography of the area is generally flat, which is typical of the Town of Clay and the northern portion of Onondaga County. Undeveloped areas contain mixed upland and wetland vegetation including grasses, shrubs, and woodlands. These resources are described in detail later in this chapter under existing ecology and vegetation. The area of the expanded Park that includes Burnet Road contains approximately three dozen residential properties that have been or will be acquired by OCIDA through voluntary purchase agreements or pursuant to the EDPL to help establish the expanded Park footprint,

Electrical utilities, including the National Grid electrical substation located just west of the Park and the NYPA and National Grid transmission lines passing through the northern third of the site are prominent visual features in the area. A telecommunications tower also exists within the expanded Park adjacent to the southeastern corner of the current Park footprint. The presence of these public utility structures and uses incorporates an industrial element to the otherwise undeveloped character of the area.

Existing development in the area surrounding the existing Park is either low density single-family suburban style housing or older style rural homes and former farmland. A few business and commercial uses exist along Caughdenoy Road and NYS Route 31 west and south of the Park. With the exception of the area extending north of the Park for several miles that remains largely rural and undeveloped or sparsely developed, surrounding areas in other directions become more densely developed farther away from the Park. Areas east of site along NYS Route 31 and Brewerton Road in the Town of Cicero contain dense concentrations of business and commercial development with residential development interspersed throughout. Higher-density residential and commercial development along the NYS Route 31 corridor within the Town of Clay occurs mostly to the south and southeast of the Park along Stearns Road and Caughdenoy Road north of I-481. Areas farther west of site transition from suburban residential into a developed, high-traffic shopping area along NYS Route 31 around the I-481 interchange. The





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This section inadequately addresses the the population demographics.



development of retail, commercial and residential growth farther away from the Park in both directions along NYS Route 31 in Clay and Cicero is due in large part to the proximity of NYS Route 31 to I-81, I-481, I-90 and the Syracuse Hancock International Airport. Together, those features have made the greater surrounding area attractive to many forms of development.

## 3.3 Transportation

### 3.3.1 Summary of Traffic Impacts

Since the preparation of the 2012 Traffic Impact Study that was part of the 2012 DGEIS and finalized in the 2013 FGEIS, traffic roadway changes include:

- The addition of exclusive eastbound and westbound left turn lanes along NYS Route 31 at Henry Clay Boulevard;
- The unsignalized intersections of NYS Route 31/Caughdenoy Road and NYS Route 31/Legionnaire Drive/Lawton Road were signalized;
- The Caughdenoy Road/NYS Route 31 intersection was also recommended for right and left turn lane additions; however, the current development assumptions have changed with multiple site entrances and placement of entrance further from the signalized intersection.

Impacts related to the proposed expanded Park are described in Section 4.3.

A new Traffic Impact Study (TIS) was prepared to evaluate potential traffic impacts associated with the proposed expanded Park area. Due to the generic nature of this review, the TIS includes more generic as opposed to specific development details and follows the assumptions to develop the traffic impact of the proposed expansion and potential development, which include supporting between 3,750 to 4,000 employees (4,000 used for analysis), having a minimum of two driveways for site access: one driveway will be connected to Caughdenoy Road and the other will be connected to NYS Route 31; operating 24 hours a day and seven days a week with three equally sized rotating working shifts; and development of the Project site will be completed and operational by the year 2024.

Additional information is provided in the TIS in Appendix B.

### 3.3.2 Impacted Traffic Area

The impacted traffic area includes both Town of Clay and Town of Cicero in New York. A total of 14 intersections along NYS Route 31 were studied from the western limits of NYS Route 481 to the eastern limits of CR 123 (Lakeshore Road) and southern limits of Caughdenoy Road at Maple Road. Minor stop-controlled side streets were not evaluated. See Figure 1 for Project Location Map in the Traffic Impact Study located in Appendix B.

The intersections include:

1. NYS Route 31 / NYS Route 481 Southbound Off Ramp / Soule Road
2. NYS Route 31 / NYS Route 481 Northbound Ramps
3. NYS Route 31 / Marketfair Plaza





4. NYS Route 31 / Great Northern Mall West Driveway / Water Board Lane
5. NYS Route 31 / Great Northern Mall East Driveway / La-Z-Boy Driveway
6. NYS Route 31 / Morgan Road (CR 46)
7. NYS Route 31 / Henry Clay Boulevard (CR 265 / CR 121)
8. NYS Route 31 / CR 49 (Caughdenoy Road)
9. NYS Route 31 / Legionnaire Drive / Lawton Road
10. NYS Route 31 / US Route 11
11. NYS Route 31 / I-81 Southbound Ramps
12. NYS Route 31 / I-81 Northbound Off Ramp / CR 253 (Pardee Road)
13. NYS Route 31 / CR 123 (Lakeshore Road) (unsignalized)
14. CR 49 (Caughdenoy Road) / CR 197 (Maple Road) / NYS Route 481 Northbound Off-ramp (unsignalized)

### 3.3.3 Functional Classification

The functional classifications for major streets are identified in the May 2017 NYSDOT Region 3 Functional Classification Map. The roadway of NYS Route 31 is classified as a Principal Arterial Other from NYS Route 481 to I-81 and classified Minor Arterial from I-81 to Lakeshore Road. NYS Route 31 is located within an Urban Area. The major intersecting roadways along NYS Route 31 are also classified. They are: NYS Route 481 classified as a Principal Arterial Expressway, Caughdenoy Road is classified as a Major Collector, US Route 11 is classified as a Minor Arterial, I-81 is classified as a Principal Arterial Interstate and Lakeshore Road is classified as a Major Collector. See Figure 2 for a detailed map of the roadway functional classifications in the Traffic Impact Study in Appendix B. The existing typical section on NYS Route 31 is described below:

- From NYS Route 481 to east of Morgan Road is a 4-lane divided roadway with 12-foot travel lanes and varying width marked medians
- From east of Morgan Road to west of US Route 11 is a 2-lane undivided roadway with 11-foot travel lanes between the Henry Clay Boulevard and Legionnaire Drive roadway segment
- From west of US Route 11 to Lakeshore Road is a 4-lane divided roadway with 12-foot travel lanes and center two way left turn lanes (TWLTL)

The posted speed limit varies along the corridor and the speed limit segments are identified below:

- Along NYS Route 31:
  - NYS Route 481 to east side of Morgan Road is 40 mph
  - East side of Morgan Road to Grange Road is 55 mph
  - Grange Road to east side of Caughdenoy Road is 40 mph
  - East side of Caughdenoy Road to east side of Barcaldine Drive/Legionnaire Drive is 55 mph
  - East side of Barcaldine Drive/Legionnaire Drive to west side of US Route 11 is 45 mph
  - West side of US Route 11 to Lakeshore Road is 35 mph
- Along Caughdenoy Road:
  - NYS Route 31 to Maple Road is 35 mph



### **3.3.4 Data Collection**

It was determined that existing traffic count data could be used, and new count data would also be required. Following NYSDOT Traffic Data Collection Guidance during COVID-19 Pandemic Memo dated August 11, 2020 which states traffic count data older than 5 years would need to be collected again, JMT reviewed and have used an adjustment factor created to help balance and match existing traffic volume data.

The processing timeframes described above are to encompass morning peak and evening peak hour vehicle volumes. However, after processing the data, the peak times used for analysis were 7:15 to 8:15 AM and 4:15 to 5:15 PM.

### **3.3.5 Existing Facilities for Non-Motorized Traffic**

Sidewalks exist along limited sections of NYS Route 31 but are missing from large sections of that road. Sidewalk is present from just west of US Route 11 to Lakeshore Road, along both sides of the road. Sidewalk is also present on the south side only of Legionnaire Drive and Lawton Road, and a small portion of sidewalk exists near the at-grade railroad crossing and Weller Canning Road along the north side only. Sidewalk is also located starting from the east side of Morgan Road to East Mall Entrance along the north side only.

There are no pavement marked or unmarked bike lanes along NYS Route 31 within the Project limits. NYS Route 31 is designated as State Bicycle Route 5 as a signed, on-road bicycle route that extends 365 miles from Niagara Falls across New York to the Massachusetts state line. Bicyclists can share the road with motorists along the roadway network.

## **3.4 Utilities & Community Services**

### **3.4.1 Utilities**

Figure 3.4-1 identifies the location of existing electric, natural gas, and water utilities in the vicinity of the Park, which were detailed in the 2013 FGEIS. It also illustrates the sewer expansion to the surrounding district, including the Park, and the gas utility improvements that are being proposed in conjunction with the Park expansion. Since 2013, there are no changes in the location of existing electric, natural gas, and water utilities in the vicinity of the Park.

### **3.4.2 Community Services**

Community services in the vicinity of the Park remain largely unchanged from 2013. Community service provider locations near the Park are shown in Figure 3.4-2 (located at the end of this Chapter).



Current firefighting and emergency response equipment within the Clay Fire Department includes<sup>2</sup>:

- Engine 11 – 2016 Sutphen - 1,750 gallons per minute (gpm)/1,000-gallon water / 20 Gallon Foam cell
- Engine 31 – 2016 Sutphen - 1,750 gpm/1,000-gallon water / 20 Gallon Foam cell
- Engine 12 – 2007 American LaFrance - 2,000 gpm/1,000-gallon water / 25-gallon foam cell
- Rescue 3 – 2003 American LaFrance – Hurst Tools System/Lighttower
- Squad 1 – 2018 Chevy Tahoe - First Responder Vehicle for EMS
- Squad 3 - 2018 Chevy Tahoe - First Responder Vehicle for EMS
- Squad 4 – 2008 Ford/Brand FX Light Rescue truck
- Ladder 3 –2021 Sutphen 75-foot mid-mount ladder - 1,750 gpm/ 500 Gallon water (currently in the process of purchasing)

Emergency medical services (EMS) are provided by two EMS operators, North Area Volunteer Ambulance Corps (NAVAC), which responds to over 6,500 calls annually, and Northern Onondaga Volunteer Ambulance (NOVA), which responds to an average of 6,000 calls a year. In addition to a centrally located station, NOVA posts ambulances at Moyers Corners Fire Department Stations 1 and 3 to allow for a rapid response to any location their district<sup>3</sup>.

The Park is in the North Syracuse Central School District. The North Syracuse Central School District student enrollment was approximately 8,500 pupils in 2020<sup>4</sup>.

The locations of places of worship are included on the Figure 3.4-2. The inventory of places of worship in the vicinity of the Park is largely unchanged since the 2013 FGEIS was prepared. At least one new church affiliated building, the Upstate New York District Church of the Nazarene, has been built immediately east of the intersection of NYS Route 31 and Burnet Road. The Church uses this location as its main offices for the Nazarene District.

## 3.5 Topography, Geology & Soils

### 3.5.1 Topography

The topography of the Project site is generally the same as was detailed in the 2013 FGEIS. The ground is relatively flat to gently sloping, with site elevations generally ranging from 380 to 430 feet above mean sea level (amsl). Figure 3.5-1 (located at the end of this Chapter) is a topographic map that shows existing topography at five-foot contour intervals. Highest elevations are in the southern portion of the Project site near NYS Route 31. The lowest elevations in the Park occur just north of the power lines. The Park drains to the north towards Youngs Creek, which is a tributary to the Oneida River.

Elevation at the expanded Park is most variable along the small ridge related to a geologic feature known as an esker. The esker, located in the central portion of the site, is a glacial formation resulting from sand

<sup>2</sup> Personal correspondence, Town of Clay Fire Chief, 4/20/21

<sup>3</sup> [www.northernonondagavolunteerambulance.org](http://www.northernonondagavolunteerambulance.org), 4/14/21

<sup>4</sup> [www.https://www.nscsd.org/districtpage.cfm?pageid=825](https://www.nscsd.org/districtpage.cfm?pageid=825), 4/13/21



and gravel materials deposited in a long, narrow ridge resembling a railroad embankment. The esker is located approximately 2,000 feet north of NYS Route 31 and generally runs parallel to the road for approximately 3,000 feet. It forms a slight ridge that is wooded and provides visual and physical separation between locations immediately to the north and south. The area directly north of the esker is wooded and the area directly south of the esker transitions first to wetlands and then uplands consisting of open fields with shrubs and grasses.

### 3.5.2 Geology

As described in the 2013 FGEIS, the surficial deposits in the vicinity of the expanded Park consist of lacustrine silts and clays deposited in pro-glacial lakes. These are generally fine-grained and laminated soils. A relatively small area, just north of NYS Route 31, is mapped as glacial till. This is a poorly sorted mixture of variable soils deposited beneath glacial ice. Bedrock beneath the site is mapped as dolostone/limestone, belonging to the Lockport Group. Although, soil borings drilled at the site encountered weathered shale. No bedrock outcrops have been noted on the project site.

A Geotechnical Investigation Report<sup>5</sup> previously prepared for the Park, included analysis of certain areas within the expanded site. The investigation included the advancement of six soil borings to depths of 9.5-15 feet. According to that investigation, the expanded Park is overlain by a thin layer of topsoil, approximately six inches in thickness. Underlying the topsoil is a layer of silt and fine sand, with varying percentages of fine to medium gravel. The thickness of this deposit varies from 4 to 13 feet. Below this layer is a more consolidated unit composed of firm silt to dense sand, and a silt mixture with varying percentages of gravel. This dense material is likely a glacial till deposit. Bedrock (shale) was encountered in two borings at depths of 5.5 to 13.5 feet just north of NYS Route 31.

There are no mineral resource extraction areas (gravel pits, mines, quarries, oil/gas wells, etc.) present on the expanded Park.

The expanded Park is in a seismically stable zone. The United States Geological Survey (USGS) produced a 2014 Seismic Hazard Map for New York State<sup>6</sup> showing the site within a zone that has a 2% probability of exceeding a spectral acceleration (i.e., ground movement) of 8-10% gravity. This seismic risk zone is the second lowest of six zones in the State.

### 3.5.3 Soils

The expanded Park contains a variety of soils similar to what was evaluated in the 2013 FGEIS. Figure 3.5-2 (located at the end of this Chapter) provides a map of all soil types on the expanded site and Table 3.5-1 summarizes the characteristics of each soil type.

Niagara silt loam (NgA) covers much of the northern and eastern portions of the expanded Park, about 38.1%. Collamer silt loams (ChA, ChB) cover 28.6% of the expanded project site, including much of the north-central and southeastern areas. In addition to Appleton loam (AoA), Hilton loam (HIA, HIB),

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<sup>5</sup> C&S Engineers, Inc. Geotechnical Investigation Report (1996).

<sup>6</sup> [www.usgs.gov/media/images/2014-seismic-hazard-map-new-york](https://www.usgs.gov/media/images/2014-seismic-hazard-map-new-york)" <https://www.usgs.gov/media/images/2014-seismic-hazard-map-new-york>



Madrid fine sandy loam (MdC), and Rhinebeck silt loam (Rh), the remainder of the expanded site is covered by minor amounts of Canandaigua (Cd), Dunkirk silt loam (DuC), Fluvaquents (FL), Fonda mucky silty clay loam (Fo), Minoa fine sandy loam (MtA), Ontario loam (OgB, OgC), and Palms muck (Pb).

Based on the physical features of the expanded Park, the most likely area for development is west of Burnet Road. In this area, the amount of hydric soils (Cd, FL, and Pb) is approximately 18.7 acres. Hydric soils are characterized by poor drainage and are often associated with wetlands.

Portions of the expanded Park were used for farming in the past. The Natural Resources Conservation Service (NRCS) classifies soils by capability classes based on their potential for agricultural productivity.

Soil Capability Classes 1-5 are described as follows (USDA Soil Survey of Onondaga County, NY<sup>7</sup>):

- Class 1 soils have few limitations that restrict their use
- Class 2 soils have minor to moderate limitations that limit their ability to support certain crops, or that require moderate conservation practices
- Class 3 soils have severe limitations that reduce the choice of crops, require special conservation practices, or both
- Class 4 soils have very severe limitations that reduce the choice of crops, require very careful management, or both
- Class 5 soils are not likely to erode, but have other limitations, impractical to remove, that limit their agricultural use largely to pasture, range, woodland, or wildlife

Table 3.5-1 shows the distribution of soil capability classes on the expanded Park.

The expanded Park has no Class 1 soils. Class 2 soil covers approximately 39.4%, Class 3 soil covers 51.8%, Class 4 soil covers 0.9%, and Class 5 soil covers 7.5% of the expanded Park. Approximately 60% of the expanded Park consists of soils (Classes 3, 4, and 5) that would have severe limitations for agricultural productivity. The remainder of the site consists of Class 1 and 2 soils that would have few to moderate limitations in their ability to support certain crops, or that require moderate conservation practices.

As shown on Table 3.5-1, 39.4% of expanded Park soils are considered prime farmland and 9.7% of soils are farmland of statewide importance, as determined by the USDA. The remainder of the soils are considered prime farmland, if drained (42.1%), or not prime farmland (8.4%). In addition, 78.1% of the expanded site soils belong to Mineral Soil Groups 1-4, as designated by the New York State Department of Agriculture and Markets. Although agriculturally viable soils exist on the Park, actual agricultural activity is limited. Most of the expanded Park is currently vacant woodlands. Agricultural activities, primarily hayfields, are located at the northern end of Burnet Road. Some cultivated fields also exist in this area. No designated Agricultural Districts exist on the project site and the closest Agricultural District is approximately one-mile northwest (Onondaga County Agricultural Districts, 2019<sup>8</sup>).

<sup>7</sup> USDA. Soil Survey of Onondaga County, New York via NRCS Web Soil Survey (2021).

<sup>8</sup> New York State Department of Agriculture and Markets. Onondaga County Agricultural Districts (2019).





Similar to the Park as evaluated in the 2013 FGEIS, the suitability of soils for septic systems varies across the expanded site. It generally ranges between conditions considered suitable to areas with conditions that are generally not suitable. It is not anticipated that onsite septic systems will be needed for the Park.

Table 3.5-1 also provides potential constraint ratings for each soil, relative to the following specified uses: shallow excavation, lawns and landscaping, local roads, and commercial buildings. This constraint rating information was obtained from the Onondaga County Soil Survey.

Each soil-type is described as “Not Limited”, “Somewhat Limited” or “Very Limited” for the specified use based on soil characteristics (load-bearing capacity, drainage characteristics, slope).

- Not Limited indicates the soil has characteristics that are very favorable for the specified use. Good performance and very low maintenance can be expected.
- Somewhat Limited indicates the soil has characteristics that are moderately favorable for the specified use. Limitations can be overcome or minimized by special planning, design, or installation. Fair performance and moderate maintenance can be expected.
- Very Limited indicates the soil has one or more characteristics that are unfavorable for the specified use. The limitations generally cannot be overcome without soil reclamation, special design, or installation procedures. Poor performance and high maintenance can be expected.

In the expanded Park, about 87.7% of soils are rated as Very Limited for shallow excavation; about 18.9% of soils are rated as Very Limited for lawns and landscaping; 51.2% of soils are rated as Very Limited for local roads; and 62.1% of soils rated as Very Limited for small commercial buildings.

Many of the soils located on the expanded project site could have some constraints to development and generally speaking, special design or construction measures may be required to allow development on portions of the site. This does not preclude development of the site.

### 3.5.4 Offsite Utility Corridors

Most of the proposed gas line starting at the Clay Gas Regulator Station #147 lies within previously disturbed easements including approximately 4,500 feet along NYS Route 31 and 7,250 feet along overhead utilities. The remaining portion of the proposed gas line (1,450 feet) crosses a wooded area south of the Clay Substation and a hay field immediately north of the Jerome Fire Equipment Co. on Caughdenoy Road. The alternative gas line makes use of public rights-of-way for the entire length of the route following sections of NYS Route 31, Henry Clay Boulevard, Verplank Road, and Caughdenoy Road.

The topography of the proposed and alternative gas line routes are both relatively flat. The alternative route is slightly flatter since it is entirely along existing roadways. Bedrock geology for both routes is consistent with the expanded Park, belonging to the Lockport Group. Neither route is in a designated Agricultural District.

Soils along the proposed and alternate gas line routes are generally consistent with the expanded Park except for very small additions of Arkport very fine sandy loam (2 to 6% slopes), Colonie loamy fine





sand (0 to 6% slopes), Lakemont silty clay loam (0 to 3% slopes), and Alton gravelly fine sandy loam (0 to 3% slopes). Arkport and Alton are classified as well drained, prime farmland with a land capability classification of 2 and depths greater than 80 inches to groundwater. Colonie is classified as somewhat excessively drained, farmland of statewide importance with a land capability classification of 3, and depths greater than 80 inches to groundwater. Lakemont is classified as poorly drained, farmland of statewide importance with a land capability classification of 4, and greater than 80 inches to groundwater. The soils along the alternative gas line route are somewhat more disturbed since this route follows public roads for the entire length.

An underground electric line may also be constructed for a short distance beneath Caughdenoy Road and the railroad tracks from the existing substation to the site. No impacts to topography, geology or soils are anticipated given the short distance of this new line and its location beneath an area that was already disturbed for road construction.

## 3.6 Water Resources

### 3.6.1 Groundwater

Groundwater occurs beneath the surface within the pore spaces of soil and rock. Relatively shallow groundwater was observed on portions of the Park during a prior geotechnical investigation. Groundwater was encountered at depths ranging from 2 to 9 feet. It is anticipated that groundwater flows northward, based upon regional topography and surface water drainage, which is consistent with the Park as proposed in the 2013 FGEIS.

The proposed expanded Park is not situated within a primary, principal, or sole source aquifer.

#### *Proposed Utility Line Routes and Roadway Improvements*

The proposed utility gas and sewer line routes are partially situated within unconsolidated, confined aquifers. These sand and gravel aquifers are in the immediate vicinity of Mud Creek and are not considered primary, principal, or sole source aquifers. The majority of both proposed utility routes are outside of the mapped unconsolidated aquifers.

The proposed road improvement to Henry Clay Boulevard discussed in the TIS is located within the unconsolidated, confined aquifer described above. The remaining three roadway improvement areas discussed in the TIS, including the I-81/NYS Route 31 Interchange are not located within the aquifer but are within its vicinity. Roadway improvement activities would occur entirely above the water table, within developed and/or previously disturbed areas.

### 3.6.2 Surface Water

The Park is relatively flat to gently sloping. Elevations range from approximately 430 feet amsl along the southern boundary (NYS Route 31) to approximately 380 feet amsl along the northern boundary. Drainage is of a northwesterly flow direction towards the Oneida River. The Project site encompasses the entire esker, as described above in section 3.5.1. The Park also includes several tributaries and drains to



the north towards Youngs Creek. Two of these tributaries drain the eastern half of the site, and flow to the north-northwest, draining into Youngs Creek and ultimately to the Oneida River.

A small, unnamed tributary of Youngs Creek is located on the northern portion of the site, at the base of the onsite esker's southern embankment. The flow is intermittent and traverses through the northern and eastern parts of the site.

Both the New York Stream Classification Map (Figure 3.6-1, located at the end of this Chapter) and the NYSDEC Environmental Resource Mapper<sup>1</sup> identified several classified streams on site. Youngs Creek is in the northern portion of the site and is classified as C. Class C streams can support fisheries and are suitable for non-contact activities but are not considered protected. There are also several other classified streams (tributaries of Youngs Creek) all identified as class C tributaries to Oneida River (6 CRR-NY 899-10)<sup>9</sup>. All these tributaries are in the eastern portion of the site, two of which follow a course which crosses Burnet Road, ultimately connecting to Youngs Creek.

### ***Proposed Utility Line Routes and Roadway Improvements***

The proposed gas line connection crosses three classified streams, all identified as tributaries to Oneida River (6 CRR-NY 899-10). These three streams are all class C, which are not considered protected. Two of these tributaries connect to Shaver Creek and cross Van Hoesen Road. The other tributary is Shaver Creek. It flows in a south to north direction on the west side of the existing subdivision on Appaloosa Trail, off Van Hoesen Road, in the vicinity of the route and existing utility right-of-way.

The proposed roadway improvements outlined in the TIS are not expected to comprise any stream crossings; however, activities do have the potential to occur near classified streams. Just south of the proposed roadway improvements to the I-81/NYS Route 31 Interchange, there is a class C stream, a tributary to Oneida River (6 CRR-NY 899-10)<sup>10</sup>.

### **3.6.3 Stormwater/Drainage/Flooding**

According to Syracuse-Onondaga County Planning Agency resources<sup>11</sup>, the Park is located within the Oneida River Basin major watershed and Oneida River sub-watershed. Although a small section of the southwest corner of the Park (near NYS Route 31) is within the Shaver Creek tributary watershed, almost the entirety of the Park is located within the Youngs Creek tributary watershed.

Stormwater drainage is from south to north, consistent with the topography described above. As a result of the relatively flat nature of the Park, the potential impacts due to soil erosion is minimal.

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<sup>9</sup> New York State Department of Environmental Conservation (2021). Environmental Resource Mapper, web application, 2021. <https://gisservices.dec.ny.gov/gis/erm/>

<sup>10</sup> New York State Department of Environmental Conservation. Title 6. Department of Environmental Conservation, Chapter X, Division of Water Resources, Subchapter B. Classes and Standards of Quality and Purity Assigned to Fresh Surface and Tidal Salt Waters, Article 14. Oswego River Drainage Basin Series, Part 899. Oneida River Drainage Basin. 899.4 Table 1; 6 CRR-NY 899.4 (current as of July 15, 2020).

<sup>11</sup> Syracuse-Onondaga County Planning Agency (2003). Watersheds in Onondaga County, 2003. [http://www.ongov.net/planning/documents/map\\_gallery/Watersheds%20in%20Onondaga%20County.pdf](http://www.ongov.net/planning/documents/map_gallery/Watersheds%20in%20Onondaga%20County.pdf)



Although the Town of Clay and the Town of Cicero are both designated Municipal Separate Storm Sewer Systems (MS4), the Park is not located within either of the designated MS4 boundaries. The MS4 boundaries, however, are immediately south and east of the Park.

There are no FEMA mapped floodplains or Special Flood Hazard Areas within the Park<sup>12</sup>. The Park lies entirely within FEMA flood zone X, which is an area of minimal flood hazard.

### ***Proposed Utility Line Routes***

Based on the most current information available, the preferred sewer line route does have the potential to fall within a mapped FEMA floodplain, in the immediate vicinity of Mud Creek, north of NYS Route 31. The proposed gas line route does not fall within a mapped FEMA floodplain or Special Flood Hazard Area. (See Figure 3.6-2., located at the end of this Chapter.)

Some of the roadway improvements outlined in the TIS have the potential to fall within a mapped FEMA floodplain.

## **3.7 Air Resources**

### **3.7.1 Air Quality**

According to the EPA Green Book website<sup>13</sup> Onondaga County (including the expanded Park area) remains within attainment status of National Ambient Air Quality Standards (NAAQS) for the six criteria pollutants (*i.e.*, ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, particulate matter, and lead). The NAAQS are levels of pollutants in the ambient air that have been determined to be protective of human health, including the health of sensitive subpopulations such as children, the elderly, and those with chronic respiratory problems; in addition, they are developed to protect public welfare, including damage to property and structures, visibility, vegetation, animal species, and other concerns.

The NAAQS have been established for the following criteria pollutants that could be emitted by a prospective tenant at the proposed expanded Park: particulate matter sized 10-microns and smaller (“PM10”), particulate matter sized 2.5 microns and smaller (“PM<sub>2.5</sub>”), nitrogen dioxide (“NO<sub>2</sub>”), sulfur dioxide (“SO<sub>2</sub>”), carbon monoxide (“CO”), ozone (“O<sub>3</sub>”), and lead (“Pb”). Following is a brief discussion of each of the criteria pollutants that could be emitted by a prospective tenant.

### ***Meteorological Conditions***

Meteorological conditions for the Syracuse and Central New York region have not materially changed since the 2013 FGEIS. As part of any air permit application submitted to the NYSDEC for development of the Park, meteorological conditions will be considered. The closest National Weather Service (NWS) station to the Park that has the appropriate available data for purposes of an air permit application is the Syracuse NWS station, which is located approximately 5.4 miles southeast of the Park.

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<sup>12</sup> Syracuse-Onondaga County Planning Agency (2016). FEMA Floodplain Changes in Onondaga County (2016), 2016. [http://www.ongov.net/planning/documents/map\\_floodplain\\_revisions\\_2016.pdf](http://www.ongov.net/planning/documents/map_floodplain_revisions_2016.pdf)

<sup>13</sup> [https://www3.epa.gov/airquality/greenbook/anayo\\_ny.html](https://www3.epa.gov/airquality/greenbook/anayo_ny.html), 4/16/21



### 3.7.2 Climate Change

There is a broad international scientific consensus that human activity-generated greenhouse gas (GHG) emissions are increasing the concentration of GHGs in the atmosphere and leading to global climate change. While the contribution to climate change of a single project is very small, the combined GHG emissions from all human activity contributes to global climate change. As such, statutes, regulations and policies have been, and continue to be, implemented to address GHG emissions at global, national, regional, state and local levels. Pertinent to the potential future development at the proposed expanded Park, these statutes, policies and regulations include CLCPA and regulations under the Clean Air Act.

The CLCPA (Chapter 106 of the Laws of 2019) and Article 75 of the Environmental Conservation Law (“ECL”), require NYSDEC to promulgate regulations to establish a statewide GHG emissions limit for 2030 that is sixty percent of 1990 GHG emissions, and for 2050 that is fifteen percent of 1990 GHG emissions. The CLCPA requires that carbon dioxide equivalent (CO<sub>2</sub>e) emissions be calculated based on a 20-year global warming potential (“GWP”) for GHGs that are not carbon dioxide (CO<sub>2</sub>), as opposed to either the 100-year GWP used by the Intergovernmental Panel on Climate Change (“IPCC”) or the GWPs required by 6 NYCRR 231-13.9 that are used for permitting. The CLCPA also amended the Public Service Law to require the Public Service Commission (“PSC” or “Commission”) to establish a program to meet a target of seventy percent of statewide electrical generation from renewable sources by 2030, and a target of zero GHG emissions for statewide electrical demand by 2040. The regulations and programs to be implemented by NYSDEC and the Commission in accordance with the CLCPA are to be conducted in a manner that minimizes costs and maximizes benefits.

NYSDEC recently adopted 6 NYCRR Part 496, which limits statewide GHG emissions in 2030 and 2050 as a percentage of 1990 emissions, per the requirements of the CLCPA. As such, Part 496 limits statewide GHG emissions in 2030 to 245.87 million metric tons of CO<sub>2</sub>e, and 61.47 tons in 2050. Part 496 also includes the 20-year global warming potentials for GHGs that are not CO<sub>2</sub>. The rule applies to all emission sources in New York State, but does not itself impose compliance obligations. The final rule was published in the New York State Register on December 30, 2020. The Part 496 statewide emission limits will serve as the baseline for the promulgation of future NYSDEC CLCPA regulations for attainment of the 2030 and 2050 limits. NYSDEC also finalized its Establishing a Value of Carbon Guidelines for Use by State Agencies guidance on December 30, 2020, which is for use by State agencies to monetize benefits/costs of actions that impact GHG emissions based on societal impacts incurred as a result of climate change.

Section 7(2) of the CLCPA also requires all state agencies to consider whether its decision to issue permit(s) is inconsistent with or will interfere with the attainment of the statewide GHG emission limits established in ECL Article 75. Where such decisions are deemed to be inconsistent with or will interfere with the attainment of the statewide GHG limits, the agency must provide a detailed statement of justification as to why such limits/criteria may not be met and identify alternatives or GHG mitigation measures to be required where the project is located.



### 3.7.3 Emission Sources

Air quality conditions are influenced by stationary sources and mobile sources of air pollutants. Since 2013, no significant existing stationary sources of air emissions were identified in the vicinity of the Park. The nearest facilities with an air permit are the Buckeye Terminal in Brewerton (approximately 3.3 miles north) and Barrett Paving Materials in Phoenix (approximately 5.5 miles west)<sup>14</sup>.

Mobile source emissions continue to be driven by traffic volume and intersection levels of service (LOS). Mobile sources include commuter and truck traffic on NYS Route 31, residential traffic on Caughdenoy Road and other local roads, and occasional emissions from train traffic along the CSX rail line adjacent to the site.

## 3.8 Ecological Resources

### 3.8.1 Wetlands

The wetlands evaluation for the expanded Park area of the Project site consisted of an extensive review of state and federal agency resource information maps, soils descriptions, aerial photos, and a delineation report prepared by Terrestrial Environmental Specialists, Inc. (TES) in 2013<sup>15,16</sup>. These maps and information assisted in the identification of potential wetlands. Field reconnaissance of the Project site was not conducted as part of this Draft SGEIS<sup>17</sup>.

The wetlands identified and evaluated in the 2013 FGEIS and the expanded Park area of the Project Site, are presented on Figure 3.8-1. Wetlands previously delineated by TES are represented by hatching and are drawn as open ended in some locations to indicate the possible extension of wetland areas with the expanded Park. This figure allows for the comparison of the delineated wetlands to the state and federal wetland maps. Depending on the location of any proposed development at the Park, these areas may need to be re-evaluated through a formal delineation using state and federal criteria.

Figure 3.8-1 (located at the end of this Chapter) identifies NWI and NYSDEC-mapped wetlands in largely overlapping areas in isolated areas in the far northern and eastern portions of the Project site. Although NWI mapping indicates the potential presence of federal wetlands regulated by the U.S. Army

<sup>14</sup> New York State Department of Environmental Conservation. Accessed April 12, 2021. Retrieved from: <https://www.dec.ny.gov/chemical/32249.html>. Facilities with air permits located further than 6 miles from the Park include Anheuser Busch Brewery in Baldwinsville, Paper Conversions, Inc. in Syracuse, and Cooper Crouse-Hinds in Salina.

<sup>15</sup> National Wetland Inventory Map. Accessed April 12, 2021. Retrieved from: <https://www.fws.gov/wetlands/data/Mapper.html>

<sup>16</sup> New York State Department of Environmental Conservation. Accessed April 12, 2021. Retrieved from: <https://gisservices.dec.ny.gov/gis/erm/>

<sup>17</sup> Although field reconnaissance of the Park was not conducted as part of this Draft SGEIS, it will be required for any proposed development to verify the nature, extent and location of any regulated wetlands. A Jurisdictional Determination (JD) was approved for the 158-acre portion of the Park, as it was proposed in the 2013 FGEIS, but expired on July 28, 2012. A JD Form is not included as part of this Draft SGEIS. Further coordination with the USACE will be required to determine if any “Waters of the United States” under the Corps jurisdiction are present. If present, delineations will be conducted in accordance with the revised definition of “Waters of the United States”, which became effective on June 22, 2020. This typically would be completed during the design phase of the project, when conceptual project site layout is determined.





Concur

Corps of Engineers (USACE), the USACE does not publish official wetland maps. These mapped wetlands, including those shown outside of the NYSDEC-mapped boundaries, would be subject to the recently revised definition of regulated waters under the 2020 federal Navigable Waters Protection Rule, which is narrower in scope and has resulted in an overall lessening of what is considered regulated waters (including federal wetlands) as compared to previous rules and definitions. The definition excludes from the definition of “waters of the United States,” non-adjacent wetlands that do not directly abut or have regular surface water overflow/inundation from intermittent or perennial streams, including wetlands that are adjacent to ephemeral streams, ditches, and prior converted cropland.

NWI wetlands in this area were photo interpreted using black and white imagery from 1978 (some maps have been modified as of October 1, 2020). As a result, the actual boundaries may differ from the time the maps were created. Some reasons for these discrepancies include changes to the landscape caused by agricultural uses; ecological succession; new water drainage patterns resulting from recent commercial/residential development; mapping inaccuracies and/or deviations produced by different map scales.

The NWI-mapped wetlands range in size and are defined by different classification codes. The following mapped NWI wetland classification codes (including riverine and pond) were identified within the Park using the mapping resources described above: PSS1A, PFO1C, PFO1A, PSS1/EM5C, R4SBC, R5UBH, PUBFx, PUBFH, PUBHx, and PEM5E. The smaller Park footprint, as proposed in the 2013 FGEIS only accounts for NWI wetland classification codes: R4SBC, PSS1A, PF01A, and PUBFx. Additionally, mapping of the expanded Park Area identified NYSDEC wetland BRE-11, which is a Class III state wetland. Depending on the location of any proposed development at the Park field reconnaissance, including a wetland delineation and soil samples, may be necessary to determine the presence of any wetlands, their precise wetland boundaries, and whether there is any connection to a jurisdictional waterway.

NWI-mapped potential wetlands areas A, B, C, D, E/I, F, G, and H (which encompass NYSDEC wetland BRE-14) shown in Figure 3.8-1 were previously evaluated in the 2013 FGEIS (Draft Section 3.8.1). The regulatory status of these wetland areas may differ from 2013 based on the 2020 Navigable Waters Protection Rule, and to the extent these areas are not adjacent to navigable waters, tributaries, lakes or ponds, or are prior converted cropland, they would not fall under the USACE’s jurisdiction.

### ***Wetland A***

Wetland A is the second largest wetland on the Project site. It is found in the central portion of the property and extends to the north and south. The majority of Wetland A contains deciduous forest wetlands with smaller areas of emergent, scrub-shrub, and mixed forest wetlands. Wetland A contains an intermittent stream that flows north and continues off-site into Youngs Creek. Youngs Creek connects to the Oneida River, which is a traditional navigable waterbody (TNW). Wetland A is located in a portion of mapped state-regulated wetland (BRE-14). This mapped state-regulated wetland is in the northernmost portion of Wetland A. Additional information regarding the dominate plant species and mapped soils within this wetland area is provided in the 2013 FGEIS (Draft Section 3.8.1).





Author:Dennis R. Roote, P.E. Subject:Highlight Date:6/11/2021 12:19:47 PM

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This statement does not adequately discuss or ecological succession nor does it state its importance or address impacts to those areas.



### ***Wetland B***

Wetland B is in the central portion of the Project site along the eastern boundary. Hydrology indicators throughout this wetland included drainage patterns. This wetland does not appear to be connected to a tributary system and is, therefore, considered isolated. Additional information regarding the dominate plant species and mapped soils within this wetland area is provided in the 2013 FGEIS (Draft Section 3.8.1).

### ***Wetland C***

Wetland C is in the southeastern portion of the Project site. Wetland C is a wet meadow. Wetland C drains to the east off-site. Additional information regarding the dominate plant species, mapped soils, and the wetlands connection to possible tributary systems is provided in the 2013 FGEIS (Draft Section 3.8.1).

### ***Wetland D***

Wetland D is in the north-central portion of the Project site. Wetland D is a mix of wet meadow and scrub-shrub wetland cover types. There was no tree or shrub layer in the wet meadow portion of Wetland D. Additional information regarding the dominate plant species, mapped soils, and the wetlands connection to possible tributary systems is provided in the 2013 FGEIS (Draft Section 3.8.1).

### ***Wetland E/I***

Wetland E/I is the largest wetland on the Project site and is located in the northern section of the site. Wetland E/I contains wet meadow, scrub-shrub, and deciduous forest wetland cover types. Wetland E/I also contains an intermittent stream that flows north and continues off-site into Youngs Creek. Wetland E/I is in an area mapped as state-regulated wetland, BRE-14. This mapped state-regulated wetland is in the eastern portion of Wetland E/I. The wet meadow portion of Wetland E/I contains no tree or shrub layers. The scrub-shrub portion of Wetland E/I had no tree layer. Additional information regarding the dominate plant species, mapped soils, and the wetlands connection to possible tributary systems within this wetland area is provided in the 2013 FGEIS (Draft Section 3.8.1).

### ***Wetland F***

Wetland F is in the northeastern portion of the Park between Wetland A and Wetland D. Wetland F is a scrub-shrub wetland. Additional information regarding the dominate plant species, mapped soils, and the wetlands connection to possible tributary systems within this wetland area is provided in the 2013 FGEIS (Draft Section 3.8.1).

### ***Wetland G***

Wetland G is in the northwestern portion of the Project site along the western site boundary and CSX rail line. Wetland G is a scrub-shrub wetland. Additional information regarding the dominate plant species, mapped soils, and the wetlands connection to possible tributary systems within this wetland area is provided in the 2013 FGEIS (Draft Section 3.8.1).



### ***Wetland H***

Wetland H is in the northwestern portion of the Project site below Wetland G. Wetland H is an emergent wetland. There were no tree or shrub layers in this cover type. Additional information regarding the dominate plant species, mapped soils, and the wetlands connection to possible tributary systems within this wetland area is provided in the 2013 FGEIS (Draft Section 3.8.1).

### ***Additional Wetland Areas within the Park not Previously Discussed***

Due to the Park expansion, additional mapped wetland areas exist on the Project site that were not previously discussed in the 2013 FGEIS. These wetland areas were identified using the mapping resources detailed above and are described below. For consistency purposes, the continuation of the same naming convention is used to identify the additional wetland areas (J-L).

### ***Wetland J***

Wetland J is in the northwestern portion of the Project site and extends to the north and south. Wetland J is classified as palustrine scrub-shrub wetlands (PSS1A) and palustrine forested wetlands (PFO1A). Palustrine scrub-shrub wetlands contain broad-leaved deciduous trees or shrubs and is temporarily flooded. Palustrine forested wetlands are characterized by woody vegetation that is 6 meters tall or taller. Wetland J contains an intermittent stream that flows north and continues off-site into Youngs Creek. Youngs Creek connects to the Oneida River, which is a traditional navigable waterbody (TNW). Wetland J is located in a portion of mapped state-regulated wetland (BRE-14). This mapped state-regulated wetland is in the northernmost portion of Wetland J.

### ***Wetland K***

Wetland K is in the northern portion of the Project site and extends to the north and south. Wetland K is mixed with wetlands classified as palustrine scrub-shrub (PSS1A), emergent (EM5C & PEM5E) and palustrine forested wetlands (PFO1C). Palustrine scrub-shrub wetlands consist of broad-leaved deciduous trees and shrubs. Emergent wetlands typically have large perennial grass such as *Phragmites australis*. Palustrine forested wetlands are characterized by woody vegetation that is 6 meters tall or taller. Wetland K is characterized as being typically flooded and seasonally flooded within various areas of the wetland. Wetland K contains an intermittent stream that flows north and continues off-site into Youngs Creek. Youngs Creek connects to the Oneida River, which is a traditional navigable waterbody (TNW). Wetland K is located in a portion of mapped state-regulated wetland (BRE-11). This mapped state-regulated wetland is in the northernmost portion of Wetland K.

### ***Wetland L***

Wetland L is in the southeastern portion of the Project site and extends to the north and south. Wetland L is classified as palustrine forested wetlands (PFO1C) and emergent wetlands (EM5E). Palustrine scrub-shrub wetlands consist of broad-leaved deciduous trees and shrubs. Emergent wetlands typically have large perennial grass such as *Phragmites australis*. Wetland L is characterized as being typically flooded and seasonally flooded within various areas of the wetland. Wetland L contains an intermittent stream that flows north and continues off-site into Youngs Creek. Youngs Creek connects to the Oneida River, which



is a traditional navigable waterbody (TNW). Wetland L is located in a portion of mapped state-regulated wetland (BRE-11). This mapped state-regulated wetland is in the northernmost portion of Wetland L.

### ***Proposed Utility Line Routes and Roadway Improvement Areas***

Due to the expiration of both the USACE Jurisdictional Determination (JD) and wetland delineation performed by TES in 2013, a preliminary review of mapped NWI and NYSDEC wetlands was conducted for the proposed utility line routes. The preliminary review identified NYSDEC-mapped wetlands along Mud Creek that are classified as Class I wetlands and NWI-mapped wetlands that are classified as riverine (R4SBC & R5UBH), freshwater forested/shrub wetland (PFO1E & PSS1E), and freshwater emergent wetland (PEM5C). These areas are further described in section 3.8.2.2. NWI mapped wetlands were identified near the abandoned overhead utility line easement whereas the NYSDEC map does not identify wetlands within this area.

With respect to roadway improvement areas identified in the TIS, a preliminary review of the NWI and NYSDEC maps indicates NWI and NYSDEC-mapped wetlands of differing sizes only in the vicinity of I-81/NYS Route 31 Interchange. Wetlands are not mapped near the NYS Route 31, Caughdenoy Road, or Henry Clay Boulevard roadway improvement areas. The NYSDEC map identifies a Class II wetland located southeast of NYS Route 31.

Wetland D, which was previously delineated by TES in 2013, is located in the vicinity of the proposed driveway entrance at Caughdenoy Road. Based on the new Navigable Waters Protection Rule, depending on the exact location of any proposed development at the Park, potential wetland areas may need to be reevaluated to determine whether they are jurisdictional adjacent wetlands.

A formal delineation using state and federal criteria has not been conducted at this time but will be completed prior to detailed engineering design to confirm that the preferred route will avoid wetlands to the maximum extent possible.

### **3.8.2 Vegetation**

The land cover types contained in the 2013 FGEIS utilized aerial imagery and field investigation for identification. The Park, as it was proposed in the 2013 FGEIS, is mostly made up of various upland cover types, with open field making up most of the site (approximately 35%) and wetland cover types consisting of less than 20%. The land cover types included in the 2013 FGEIS are: open field; scrub-shrub upland; and deciduous forest upland as upland cover types; as well as: wet meadow; emergent wetland; scrub-shrub wetland; and deciduous forest wetland as wetland cover types.

The land cover types of the proposed expanded Park area were analyzed only utilizing data from the National Land Cover Database (NLCD) (2016)<sup>18</sup>. As this is a different resource than what was used in the 2013 FGEIS analysis, the categories of classification of land cover types differ. Therefore, comparisons

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<sup>18</sup> National Land Cover Database (2016). Accessed April 6, 2021. Retrieved from: [https://utility.arcgis.com/usrvcs/servers/296c2474ac94415dab80067c3f5ffe94/services/USA\\_NLCD\\_Land\\_Cover/ImageServer](https://utility.arcgis.com/usrvcs/servers/296c2474ac94415dab80067c3f5ffe94/services/USA_NLCD_Land_Cover/ImageServer)



can only be made between the similar classifications of the land cover and should not be considered exact. A comparison of the land cover types of the expanded Park with the previous footprint is provided below.

Vegetation cover types identified on the expanded Park using data from the NLCD are shown in Figure 3.8-3 (located at the end of this Chapter). The acreage of each cover type is presented in Table 3.8-1.

Table 3.8-1: Acreage of Vegetation Cover Types					
Expanded (SGEIS) Footprint			Previous (2013 FGEIS) Footprint*		
Vegetation/Land Cover Type	Acreage	% of Site	Vegetation/Land Cover Type	Acreage	% of Site
<b>Upland</b>	<b>1003±</b>	<b>80±</b>	<b>Upland</b>	<b>275.7±</b>	<b>81.3</b>
Developed Open Space	22±	2±	Residential/Developed	2.43	0.7
Developed Low Intensity	4±	<1	-	-	-
Deciduous Forest	402±	32±	Deciduous Forest Upland	45.34	13.4
Evergreen Forest	3±	<1	Evergreen Forest Upland	0.86	0.3
Mixed Forest	4±	<1	Mixed Forest Upland	37.09	10.9
Shrub/Scrub	2±	<1	Scrub-Shrub Upland	69.75	20.6
Pasture/Hay	525±	42±	Open Field	120.25	35.3
Cultivated Crops	41±	3±	-	-	-
<b>Wetland</b>	<b>250±</b>	<b>20±</b>	<b>Wetland</b>	<b>63.5+-</b>	<b>18.7</b>
Open Water	<1	<1	Open Water	0.26	0.1
Woody Wetlands	220±	18±	Deciduous Forest Wetland	33.09	9.8
-	-	-	Mixed Forest Wetland	0.35	0.1
Emergent Herbaceous Wetlands	29±	2±	Emergent Wetland	0.89	0.3
-	-	-	Wet Meadow	9.19	2.7
-	-	-	Scrub-Shrub Wetland	19.76	5.8
<b>Total</b>	<b>1253±</b>	<b>100</b>	<b>Total</b>	<b>339.26+-</b>	<b>100</b>

\*Acreages shown as provided in the 2013 FGEIS.

Each upland and wetland vegetation/land cover type classification for the expanded footprint is described in section 3.8.2.1 and 3.8.2.2 below, according to the NLCD definitions<sup>19</sup>.

### *Upland Vegetation*

As explained above, the upland cover types, which were considered in the 2013 FGEIS (Draft Section 3.8.2.1), include residential/developed areas, open fields, scrub-shrub areas, deciduous forest, mixed forest, and evergreen forest. This analysis was updated utilizing a different data resource, the NLCD, containing different classifications of cover types to account for the total expanded footprint of the Park.

Based on review of the NLCD Land Cover data, more than three-fourths of the expanded Park is made up of upland cover types. These communities represent approximately 1,003 acres, up from the

<sup>19</sup> National Land Cover Database 2016 (NLCD2016) Legend. Accessed April 6, 2021. Retrieved from: <https://www.mrlc.gov/data/legends/national-land-cover-database-2016-nlcd2016-legend>



approximately 276 acres identified in the 2013 FGEIS, which is approximately 80% of the expanded footprint of the Park.

The definitions of all land cover types apply only to those from the NLCD, the similar classifications from the 2013 FGEIS are listed as general comparison only.

### ***Developed Open Space***

The NLCD Legend defines developed open space as areas with less than 20% impervious surfaces, and vegetation dominated by lawn grass. Per NLCD, typically, these areas include “large-lot single-family housing units, parks, golf courses, and vegetation planted in developed settings for recreation, erosion control, or aesthetic purposes.”

Various portions of developed open space can be found at the west and south edges of the Park, along Caughdenoy Road and NYS Route 31, as well as along Burnet Road. The total area defined as developed open space as part of the expanded Park is approximately 22 acres, or approximately 2% of the Park.

### ***Developed Low Intensity***

The NLCD Legend defines developed low intensity as areas with between 20-49% impervious surfaces, containing a mix of vegetation and constructed materials. These areas mostly include single family housing units.

Various areas defined as developed low intensity can be found at the west and south edges of the Park, along Caughdenoy Road and NYS Route 31, as well as towards the east side of the Park along Burnet Road. The total area defined as developed low intensity as part of the expanded footprint is approximately 4 acres, or less than 1% of the Park.

Compared to the land cover types considered in the 2013 FGEIS, developed open space and developed low intensity land cover are most like the “residential/developed” classification (see Table 3.8-1). On the previous footprint, residential/developed land cover was very minimal, taking up less than 1% of the total land cover. Based on NLCD information for the total expanded footprint, the combined developed open space and developed low intensity land cover take up approximately 3% of the total land cover on the expanded Park footprint.

### ***Deciduous Forest***

Deciduous forests are defined by the NLCD Legend as areas with trees greater than five meters tall accounting for greater than 20% of the total vegetation. Tree species which shed foliage in response to seasonal changes make up greater than 75% of tree species in these areas.

Deciduous forest areas for the proposed expanded Park constitute approximately 402 acres or about 32% of the Park, the second largest portion of the Park after pasture/hay. These forested areas were interspersed throughout the entirety of the expanded Park footprint, with large areas in the north, east, and west-central portions. Compared to the land cover types considered in the 2013 FGEIS, deciduous forest as defined by the NLCD is most like the “deciduous forest upland” cover type (see Table 3.8-1). On the



previous footprint, deciduous forest upland vegetation was only about 13% of the total vegetation/land cover types, in contrast with the 32% of deciduous forest vegetation on the expanded Park footprint.

### ***Evergreen Forest***

Evergreen forests are defined by the NLCD Legend as areas with trees greater than five meters tall accounting for greater than 20% of the total vegetation. Greater than 75% of tree species in these areas maintain their foliage year-round.

Evergreen forest areas for the expanded Park footprint represent approximately 3 acres or less than 1% of the Park. Evergreen forests occur in the northeast and south-central portion of the expanded Park footprint. Compared to the land cover types considered in the 2013 FGEIS, evergreen forest as defined by the NLCD is most like the “evergreen forest upland” cover type (see Table 3.8-1). On the previous footprint, evergreen forest upland vegetation was less than 1% of the total vegetation/land cover types, which is the same percentage of evergreen forest vegetation on the expanded Park footprint.

### ***Mixed Forest***

According to the NLCD, mixed forest areas are dominated by trees greater than five meters tall, which account for greater than 20% of the total vegetation. A mixed forest is defined as having neither deciduous nor evergreen tree species at greater than 75% of the total tree cover.

Mixed forest uplands for the expanded footprint represents approximately 4 acres or less than 1% of the Project site. Mixed forest uplands occur in the east-central and west-central portions of the Park. Compared to the land cover types considered in the 2013 FGEIS, mixed forest as defined by the NLCD is most like the “mixed forest upland” cover type (see Table 3.8-1). On the previous footprint, mixed forest upland vegetation was approximately 11% of the total vegetation/land cover types, much higher than the less than 1% of mixed forest vegetation identified by the NLCD on the expanded Park footprint.

### ***Shrub/Scrub***

In accordance with the NLCD Legend, there is a small area located east of Burnet Road identified as Shrub/Scrub. This area is defined as having shrub canopy greater than 20% of the total vegetation. The NLCD defines shrubs as less than five meters tall and can include true shrubs, young trees, or trees that exhibit stunted growth due to environmental conditions.

An area of shrub/scrub vegetation for the expanded Park footprint comprises approximately 2 acres or less than 1% of the Park. This vegetative cover is in the east-central portion of the expanded Park footprint, east of Burnet Road and surrounded by an area of pasture/hay vegetation. Compared to the land cover types considered in the 2013 FGEIS, shrub/scrub as defined by the NLCD is most like the “scrub-shrub upland” cover type (see Table 3.8-1). In the 2013 FGEIS, scrub-shrub upland vegetation was the second most abundant upland cover type, making up approximately 21% of the total cover. This is significantly higher than the less than 1% of shrub/scrub cover as defined by the NLCD within the expanded Park footprint.





### ***Pasture/Hay***

As defined by the NLCD Legend, pasture/hay is a subgroup of the “Planted/Cultivated” section. It is defined as an area where greater than 20% of the total vegetation is intended for grazing livestock or seed/hay crops. Typically planted on a perennial cycle with “grasses, legumes or grass-legume mixtures.”

Pasture/Hay areas cover the largest portion of the expanded Park footprint. This vegetation cover type occurred on approximately 525 acres or about 42% of the park. The pasture/hay areas are found mainly in the central, southern, and western portions of the expanded Park footprint.

### ***Cultivated Crops***

Cultivated crops are defined by the NLCD Legend as areas of annual crop production, and all actively tilled land. The total vegetation in the area is made up of greater than 20% crop vegetation.

Cultivated crops are identified in three areas, all centrally located, in the center and in the southern portions of the expanded Park footprint. The two areas in the south are on either side of Burnet Road. The cultivated crop areas for the expanded Park make up approximately 41 acres, or about 3% of the Park.

Compared to the land cover types considered in the 2013 FGEIS, pasture/hay and cultivated crops as defined by the NLCD are most like the “open field” cover type (see Table 3.8-1). In the 2013 FGEIS, open field vegetation was the most abundant upland cover type, making up approximately 35% of the total cover within the previous footprint. This is similar to the combined pasture/hay and cultivated crops cover type as defined by the NLCD, which makes up approximately 45% of the total land cover types on the expanded Park footprint.

### ***Utility Corridor***

The vegetation/land cover types within the proposed utility corridor are not included in Table 3.8-1. The vegetation in the proposed utility corridor were not discussed in the 2013 FGEIS. The relevant land cover types within the utility corridor as defined by the NLCD are described below.

Based on preliminary review of the NLCD data most of the proposed utility corridor is comprised of pasture/hay land cover, while small portions are composed of deciduous forest, mixed forest, cultivated crops, developed open space, developed low intensity, and developed medium intensity land cover.

The land cover type found in the utility corridor is developed medium intensity land cover. Developed medium intensity cover is defined as areas with between 50-79% impervious surfaces, containing a mix of vegetation and constructed materials, according to the NLCD Legend. These areas mostly include single family housing units.

### ***Proposed Roadway Improvements***

Based on preliminary review of NLCD data, the land cover/vegetation types were identified at each proposed roadway improvement outlined in the TIS. The area surrounding and including the driveway entrance on Caughdenoy Road is made up of developed open space, developed low intensity, and pasture/hay land cover types. The area surrounding and including the driveway entrance on NYS Route



31 is comprised of developed open space, deciduous forest, shrub/scrub, pasture/hay, and cultivated crops land cover types. The area surrounding and including the Henry Clay Boulevard and NYS Route 31 intersection is made up of developed open space, developed low intensity, developed medium intensity, developed high intensity, pasture/hay, and cultivated crops land cover types. Developed high intensity land cover is defined by the NLCD as “highly developed areas where people reside or work in high numbers.” This can include commercial and industrial buildings, row houses, and apartment complexes. The total cover is considered 100% impervious surface. The area surrounding and including the NYS Route 31 and Interstate 81 intersection is comprised of developed open space, developed low intensity, developed medium intensity, developed high intensity, pasture/hay, and deciduous forest land cover types.

### ***Wetland Vegetation***

The 2013 FGEIS indicates there is approximately 63.5 acres of wetlands/water cover types or approximately 18.7% of the previous footprint of the Park. The expanded Park is now approximately 249.82 acres of wetlands/water cover types or approximately 19.98% of the expanded Park footprint. The expansion of the Park increased the study area, thereby expanding the wetland cover types on site. These wetland cover types include open water, woody wetlands, and emergent herbaceous wetlands. Wetland cover types are also depicted in Figure 3.8-3. A field reconnaissance of the Park was not conducted as part of this Draft SGEIS. Depending on the location of any proposed development at the Park, a wetland delineation may be required prior to any development to collect field data on present hydrophytic vegetation and confirm the actual presence and boundaries of jurisdictional wetlands.

### **3.8.3 Open Water**

Open water within the expanded Park footprint covers approximately 0.44 acres, or 0.04% of the Park. This cover type constitutes the smallest proportion of the site. Open water is located centrally on the east edge of the Park. Open water areas are defined as generally having less than 25% coverage in terms of vegetation or soil. The 2013 FGEIS identified open water as covering approximately 0.3 acres, or 0.1% of the site.

### ***Woody Wetlands***

Woody wetland cover types for the expanded footprint cover 220.38 acres, or 17.63% of the Park. This cover type is located mainly in the northeastern portion of the Park, with smaller areas in the western and southeastern portion of the Park.

Woody wetland cover types are defined by the NLCD Legend as areas where greater than 20% of the total vegetative cover is forest or shrubland vegetation. The soil or substrate in these areas is also covered with water or periodically saturated.

Compared to the land cover types considered in the 2013 FGEIS, deciduous forest and mixed forest wetland as defined by the NLCD are most like the “woody wetlands” cover type (see Table 3.8-1). On the approximately 339+/- acre Park site, woody wetland vegetation was the most abundant wetland cover type, making up approximately 18% of the total cover within the previous Park footprint.





### ***Emergent Herbaceous Wetlands***

Emergent herbaceous wetland cover types for the expanded Park footprint covers 29 acres, or 2.32% of the Park. This cover type can be found mainly in the northeastern portion of the Park, with small areas in the central western portion.

Emergent herbaceous wetland areas are similarly defined as emergent wetlands, as areas where the soil or substrate is either covered with water or periodically saturated. The NLCD Legend defines emergent herbaceous wetlands as areas where 80% of the total vegetative cover is perennial herbaceous vegetation.

Compared to the land cover types considered in the 2013 FGEIS, emergent wetland, wet meadow, and scrub-shrub wetland, as defined by the NLCD are most like the “emergent wetlands” cover type (see Table 3.8-1).

### ***Proposed Utility Line Routes and Roadway Improvement Areas***

The NWI maps identified Mud Creek (R2UBH) and Shaver Creek (R5UBH) flowing adjacent to and throughout the proposed utility corridor. Mapped wetland areas along Mud Creek and Shaver Creek are made up of woody wetlands, scrub-shrub, and emergent land cover types. The NWI maps also identified small freshwater ponds located throughout the Park.

The NWI maps identified an unnamed tributary (R5UBH) flowing parallel to the proposed I-81/NYS Route 31 Interchange roadway improvement area. Mapped wetland areas along the unnamed tributary are identified as a freshwater emergent wetland. The NWI maps also identifies a large freshwater pond (open waters) located southeast of the Project site. The proposed roadway improvements will have no impact on the freshwater pond.

The NLCD did not identify wetland cover types located within the proposed roadway improvement areas of Caughdenoy Road, Henry Clay Boulevard or NYS Route 31. The NWI map did identify a freshwater forested/shrub wetland located southeast from the Caughdenoy Road improvement area, but it is off-site.

A field reconnaissance will be necessary to identify dominant hydrophytic vegetation within the utility corridor and the roadway improvement areas.

### **3.8.4 Wildlife**

A comprehensive investigation was prepared for the western portion of the Project site in 2010 by Terrestrial Environmental Specialists, Inc. (TES) of Phoenix, New York to assess the onsite wildlife and habitats. The *Vegetation and Wildlife Resources at the Onondaga County Industrial Agency Site, July 2010* (“TES report”), which was included in the 2013 FGEIS (Draft Appendix E), identified common amphibian, reptile, bird, and mammal species through field reconnaissance. The common species observed are included in the following table. Land cover types on site are described above in section 3.8.2 in detail and depicted on Figure 3.8-3.



Table 3.8-2 Common Species			
<u>AMPHIBIANS</u> (5 Species)	<u>REPTILES</u> (2 Species)	<u>BIRDS</u> (68 Species)	<u>MAMMALS</u> (6 Species)
Eastern American toad	Painted turtle	<i>General Site:</i> Ruffed grouse; great-crested flycatcher; red-eyed vireo; tufted titmouse; white-breasted nuthatch; wood thrush; American redstart; and ovenbird	Woodchuck
Gray tree frog	Common garter snake	<i>Within the deciduous forested areas:</i> Black-billed cuckoo, eastern wood pee-wee, blackburnian warbler, and black-and-white warbler (*observed during breeding season)	Eastern chipmunk
American bullfrog		<i>Within open fields:</i> Red-tailed hawk; eastern kingbird; tree swallow; barn swallow; bobolink; field sparrow; savannah sparrow; and song sparrow	Gray squirrel
Northern green frog		<i>Within shrublands:</i> Alder flycatcher; willow flycatcher; eastern kingbird; gray catbird; blue-winged warbler; yellow warbler; common yellowthroat; eastern towhee; swamp sparrow; dark-eyed junco; northern cardinal; rose-breasted grosbeak; indigo bunting; red-winged blackbird, brown-headed cowbird; Baltimore oriole; and American goldfinch	Coyote*
Wood frog		<i>Within deciduous forest wetland habitat:</i> Hairy woodpecker; pileated woodpecker; wood veery; thrush; and common yellowthroat	Raccoon*
		<i>Within wetland areas:</i> Wood duck; magnolia warbler; and northern waterthrush.	White-tailed deer*
		<i>Species observed flying over the site from the open utility corridor:</i> Osprey and sharp-shinned hawk** (**species listed as special concern in New York State)	

\* The presence of coyote, raccoon, and white-tailed deer were detected by tracks and scat.

It is anticipated that the remainder of the expanded area of the Park, which was not surveyed by TES, would include species like those identified above (and in the 2013 FGEIS), as the land cover types and habitats are similar. It is furthermore anticipated that several of the smaller transient species listed above would likely frequent the proposed utility corridors and roadway improvement areas. Field reconnaissance of the expanded Park, proposed utility corridors and roadway improvement areas can confirm this once specific development is proposed.



### 3.8.5 Threatened and Endangered Species

Per the NYSDEC EAF Mapper and NYSDEC Environmental Resource Mapper, there are no critical environmental areas or significant natural communities within or in the vicinity of the park. This is consistent with the original findings in the 2013 FGEIS.

To determine whether listed threatened or endangered species or critical habitats are located on or in the vicinity of the Park, coordination with the New York Natural Heritage Program (NYNHP) was conducted (March 26, 2021). The evaluation also included a review of the United States Fish and Wildlife Service's (USFWS) website including the Information, Planning, and Consultation (IPaC) System, the NYSDEC EAF Mapper, and the NYSDEC Environmental Resource Mapper. Copies of the supporting documentation, including the USFWS Official Species List and NYNHP correspondences are included in Appendix A.

The NYSDEC Environmental Resource Mapper did not identify any rare or state-listed species or natural communities in the expanded Park area that were not previously identified in 2013. The NYSDEC EAF Mapper identified the Sedge wren (*Cistothorus platensis*) and Indiana bat (*Myotis sodalis*) as potentially occurring in the Park. (Both screening tools accessed on April 13, 2021; See Appendix A.) Although the NYNHP screening results from the March 2021 request have not been received as of the date of this report, the last correspondence from NYNHP, dated May 14, 2010 is consistent with the NYSDEC EAF Mapper findings, which identified the Sedge wren. Specifically, the May 2010 NYNHP response letter indicated the Sedge wren as occurring on or in the immediate vicinity of the site. Although, Sedge wrens are typically found in wet meadows, shallow emergent marshes, bogs, and fens (NYNHP 2009b), TES concluded in their 2010 report, that "while limited amounts of wet meadow and emergent wetland occur on the site, the nature of these areas does not represent appropriate habitat for this species. Therefore, Sedge wren is not expected to occur on the site." (TES, 2010)

The USFWS IPaC search results identified the following federally listed endangered (E), threatened (T), and candidate species as being known or likely to occur in or in the vicinity of the expanded Park area:

<b>Table 3.8-3: USFWS Endangered and Threatened Species</b>	
<b><u>ANIMALS</u></b>	
Indiana bat (E) ( <i>Myotis sodalis</i> )	
Eastern massasauga (T)* ( <i>Sistrurus catenatus</i> )	
*State-listed as endangered	

Both the eastern massasauga and Indiana bat were described in detail in the 2013 FGEIS. Descriptions of each species are also included below for the purpose of the expanded Park footprint and to reflect the most current information available. The 2013 FGEIS also included a discussion of the Bog turtle, but recent search findings did not indicate the potential for this species. (See Appendix A.)



The Eastern massasauga (*Sistrurus catenatus*) rattlesnake is state listed as endangered and federally listed as threatened. According to the TES report, Eastern massasauga is known to occur in only one location within Onondaga County: within the northeastern portion of the County. Massasaugas use wetland habitats such as fens, marshes, and wet prairies during hibernation and use associated uplands for foraging during the active season (Gibbs et al. 2007). Due to habitat limitations, Eastern massasaugas are not likely to occur on or in the vicinity of the Park. Furthermore, the NYNHP did not list the Eastern massasauga as occurring or likely to occur within the Park.

The Indiana bat (*Myotis sodalis*) is both state-listed and federally listed as endangered. The species hibernates in caves and mines during the winter months and uses wooded areas in association with rivers and wetland complexes, such as floodplain forests, during the spring and summer months. Species with exfoliating or furrowed bark, such as shagbark hickory and silver maple, as well as dead trees or snags, are typically used for roosting. According to the TES report, one hibernaculum is known to exist in Onondaga County. This hibernaculum is approximately 14 miles from the Park (USFWS 2007). No caves occur within the Project site; therefore, it is not expected that the Indiana bat would overwinter on the site. There is potential for Indiana bat to forage and roost on the Project site in the wooded areas that contain shagbark hickory, a common roosting tree for the bat species. TES did not observe any bat species, including the Indiana bat or evidence of any species during their site investigations.

Two additional state-listed species of special concern were observed in 2010 by TES: osprey and sharp-shinned hawk. Both species were seen flying overhead near the utility corridor ROW. TES noted that habitat for the osprey does not exist onsite and although there is potential habitat for the hawk species, none were observed nesting or foraging.

No other rare, threatened, endangered or special concern species or natural communities were identified by USFWS, NYSDEC, NYNHP or TES within or in the vicinity of the Park. (See Appendix A.)

Further confirmation of the absence of these species and habitat at the park would be determined through site reconnaissance once a specific development for the Park is proposed.

### 3.9 Cultural & Archeological Resources

The proposed Park expansion contains approximately 1,250± acres of land, much of which was historically used for agriculture. Most of the land is presently cleared, while some is overgrown, and a portion has been used for the Clay-Teall Transmission Line. Burnet Road bisects the property and is lined on both sides with an assortment of historic-aged buildings, including residential dwellings and agricultural buildings.

A Phase I Archaeological Survey Report was conducted for the 340± acre Park footprint in 2014 which resulted in a “No Effect” finding on historic properties listed or eligible for listing in the National Register of Historic Places. In response to OCIDA’s lead agency notification letter for the SGEIS, NYSDEC provided that the statewide inventory of archaeological resources records, maintained by the New York State Museum and the New York Office of Parks, Recreation and Historic Preservation, and the expanded Park is not located within a previously designated archeological sensitive area.



No previously identified historic resources which are listed in or eligible for listing in the National Register of Historic Places are located within the expanded project area. Five previous cultural resource studies have been conducted within the immediate vicinity of the expanded Park:

- *2012 Phase IA Cultural Resources Survey Report: Clay Business Park*  
In 2012, EDR Environmental Services, LLC prepared a Phase IA Cultural Resources Survey Report which addressed the results of a cultural resource survey of the approximately 340± acre project area for the Park and the proposed 4-mile sewer line. The Phase IA Cultural Resources Survey Report recommended that no above-ground historic resources would be impacted by the proposed project, and that a limited Phase IB archaeological survey should be completed within the project area and proposed sewer line.
- *2013 Phase I Archaeological Survey Report: White Pine Commerce Park (formerly Clay Business Park)*  
In 2013, EDR Environmental Services, LLC prepared a Phase I archaeological survey report which was submitted to the New York State Historic Preservation Office (NY SHPO). The report addressed the results of an archaeological survey of the approximately 340± acre project area for the Park, as well as testing of the proposed, approximately 4-mile sewer line connecting the project site to the existing wastewater treatment facilities at the Oak Orchard WWTP. The archaeological testing discovered two previously unrecorded archaeological sites: Caughdenoy Road MDS 1 Historic Site A06703.000190 and Caughdenoy Road MDS 2 Historic Site A06703.000189. Both sites were determined ineligible for listing in the NRHP. The report indicated that no above-ground historic resources were extant within the original 340± acre project site.
- *2014 Phase IB Archeological Field Reconnaissance Clay-Teall Transmission Line, Towns of Cicero and Clay, Onondaga County, New York*  
In 2014, Hartgen Archaeological Associates, Inc. conducted a Phase IB archaeological survey prior to the installation of the Clay-Teall Transmission Line. No archaeological sites were identified as a result of the survey.
- *2019 Consultation Project 19PR04378: Burnet Road Solar Farm*  
In 2019 the NY SHPO provided a no impact determination for a solar project consisting of two ground mounted facilities totaling 8.9MW on the west side of Burnet Road within the current project area. A Phase IA/IB archaeological survey for the 19PR04378 solar facility was determined to be unwarranted and the no impact determination was provided based on the limited nature of the proposed ground disturbance associated with the proposed solar farm.
- *2019 Phase I Archaeological Survey, Davis Road Pump Station Rehabilitation Project, Town of Clay, Onondaga County, New York*  
In 2019, EDR Environmental Services, LLC completed a Phase I Archaeological Survey of for the installation of 1.1 miles of wastewater force main connecting to the Oak Orchard WWTP, installed within a trench with maximum dimensions of 5 feet deep by 8 feet wide under Verplank



Road and NYS Route 31. The Phase I Survey Report recommended that no significant historic resources would be impacted by the project.

- *2020 Environmental Assessment Form*

In 2020, a Full Environmental Assessment Form was completed for the expanded project area on behalf of the Onondaga County Industrial Development Agency (OCIDA). The Environmental Assessment Form noted that no NRHP listed/eligible sites were located within the project area, and that no designated sensitive archaeological areas are adjacent, but also noted that the “proposed action may occur in or adjacent to a historic or archaeological resource.”

### 3.9.1 Historic Resources

Per the New York State Cultural Resource Information System<sup>20</sup> (NYS CRIS), 13 previously identified above-ground historic resources are located within the expanded Park. Two of these resources are located on the north side of NYS Route 31 and the remaining 11 resources are located along Burnet Road. Seventeen additional previously evaluated resources are located within the immediate vicinity of the expanded Park. Of the 30 previously identified resources one resource has been determined eligible for listing in the NRHP by the NY SHPO and 20 have been determined ineligible. The eligibility status of the remaining 9 resources is undetermined. The single eligible resource is located on the south side of NYS Route 31 (Figure 3.9-1).

Three previously identified historic period archaeological sites are located within the expanded Park. Two of these sites were identified during the 2013 Phase I archaeological survey conducted on the west side of the Project site and have been determined not eligible for listing in the NRHP. The third site is located along the proposed sewer line and has been determined not eligible for listing in the NRHP.

Residential and agricultural properties constructed prior to 1972 meet the age requirement for consideration for listing in the NRHP. Based on a review of historic aerial photographs, approximately 26 structures which have not been previously evaluated for NRHP eligibility are in the vicinity of the expanded Park and associated utility and roadway corridors. One property on Caughdenoy Road, two on NYS Route 31, and approximately eight properties on Burnet Road contain buildings which appear to have been constructed prior to 1895. Based on historic aerial photographs, most of the remaining historic-age properties appear to have been constructed between 1956 and 1972. The proposed underground utility corridors are primarily located within existing rights-of-way and their construction is not likely to impact above-ground historic resources in the vicinity of the proposed routes.

### 3.9.2 Archaeological Resources

According to NYS CRIS, the expanded Park is not located within an archaeologically sensitive zone. Small portions of the utility corridors map overlap with archaeologically sensitive zones near previously identified historic-period archaeological sites, but the utility corridors are primarily within previously disturbed areas and rights-of-way.

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<sup>20</sup> New York State Cultural Resources Information System (<https://cris.parks.ny.gov/Default.aspx>).





## 3.10 Visual Environment & Aesthetic Resources

### 3.10.1 Viewshed Existing Conditions

The Park is presently undeveloped and generally consists of a mix of large upland areas of open field (former agricultural land), shrub and woodland areas interspersed with wetland areas as described in Section 3.8. Topography in the area is generally flat to gently sloping. In general, the predominance of vegetation surrounding the Project site and the relative lack of development contributes to the area's rural character. This character is influenced by former farmsteads, scattered housing, accessory structures (garages, sheds) and some small business and industrial uses primarily along Caughdenoy Road and NYS Route 31. Typical views are shown below.



*This view is looking at the central portion of the Park from Caughdenoy Road during leaf-off season.*



*Looking north towards the southernmost portion of the Park from NYS Route 31 during leaf-on season.*

National Grid's Clay electrical substation west of the Project site and the transmission towers and high voltage power lines that spread outward from the substation into and across the northern one-third of the site are dominant elements in the local visual environment. The existing CSX rail line also contributes to the somewhat industrial nature of the area. A cell tower located north of NYS Route 31 near the Project site's southeastern corner as seen above also influences local views near the site.



*Looking at the northern portion of the Park at the CSX rail line and transmission lines during leaf-off season.*



*Looking north along Caughdenoy Road during leaf-on season. The Park is to the right.*



The relative lack of significant development in the immediate vicinity of the Park, especially views from NYS Route 31 and points east, west, and south of the NYS Route 31 corridor creates the sense of a rural area both during daytime and nighttime periods. Nighttime lighting is generated by existing residential and small businesses as well as by vehicular traffic on local roads. More suburban areas are located one-half mile or more to the east, west, and south where residential and commercial development has been occurring in recent years.

Distant views of the Park are very limited due to existing stands of woodland and shrub vegetation. The area lacks elevated viewpoints from which the Project site can be seen. Most views are therefore highly localized and in general well within one to two miles or less from areas surrounding the Project site. Views of the Park are most significant from Caughdenoy Road and to the east across open fields and farmlands and former farmlands along Burnet Road.

In late 2000, Integrated Site, Landscape Architect, P.C., a consulting firm, conducted a viewshed analysis of the Park to determine the potential visual impact of a semiconductor manufacturing plant considered for the Park at that time. Elements of that study and its conclusions remain valid and are discussed in Appendix D.

### 3.10.2 Lighting Existing Conditions

The Project site is predominantly undeveloped, therefore, there is very little light being generated from the site. Light generating sources onsite include two residences along Caughdenoy Road, three residences along NYS Route 31, 17 residences along the west side of Burnet Road, and the cell tower located onsite along NYS Route 31. The residences generate light from typical exterior residential lighting (porch lights and house or ground mounted flood lights). Those light sources generally have a limited range of visibility from offsite. Should the residences remain after the development, there are no requirements for mitigation of the residential lighting.

The cell tower along NYS Route 31 has two red warning lights mounted approximately at the mid-point of the tower. These are visible within a quarter mile approaching the tower in both directions. This lighting type, color, and intensity is typically dictated by FAA standards for obstruction marking and lighting. The cell tower will require relocation to an area outside the Park boundary, however, given the relatively close proximity to the Syracuse Hancock International Airport, the new cell tower will may require similar lighting.

## 3.11 Noise

### 3.11.1 Background

Noise is a common consideration in environmental reviews of projects under SEQRA (6 NYCRR 617.2(1)). A substantial change in noise levels can have a significant adverse impact on the environment. The NYSDEC has published a guidance document, *Assessing and Mitigating Noise Impacts*<sup>21</sup> for

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<sup>21</sup> Assessing and Mitigating Noise Impacts, New York State Department of Environmental Conservation Program Policy DEP-00-1, October 6, 2000; Revised February 2, 2001





assessing noise impacts. Information contained in NYSDEC guidance is the basis for the generic discussion of noise in this DGEIS. NYSDEC guidance defines noise as:

*“...any loud, discordant or disagreeable sound or sounds. More commonly, in an environmental context, noise is defined simply as unwanted sound. Certain activities inherently produce sound levels or sound characteristics that have the potential to create noise. The sound generated by proposed or existing facilities may become noise due to land use surrounding the facility. When lands adjoining an existing or proposed facility contain residential, commercial, institutional, or recreational uses that are proximal to the facility, noise is likely to be a matter of concern to residents or users of adjacent lands.”*

Noise is considered unwanted sound. The sound we hear is comprised of mechanical longitudinal waves with frequencies in the audible spectrum. Sound characteristics and impacts vary with frequency. Human hearing is more sensitive to sounds in higher frequencies than to sounds in the lower frequencies. An electronic scale called the “A-scale weighting network” can be applied to closely resemble human hearing. A-weighted sound levels are particularly useful noise impact assessments in relation to human hearing and are specified by NYSDEC guidance as a primary assessment metric.

Sound intensity is a measure of the magnitude of the sound pressure level (SPL), on a logarithmic scale expressed in units called decibels (dB). When noise is measured in decibels with A-scale weighting, the magnitude of the sound is expressed as “dB(A)” or “dBA.”

Sound level intensity typically varies over time and can be measured or represented as an instantaneous level, or over various periods of time as threshold levels or average levels. The equivalent sound level, or  $L_{eq}$ , was developed to quantify the time-varying pattern of noise. The  $L_{eq}$  descriptor, as it is known, quantifies the average energy content of sounds over a selected period, most commonly one hour for most noise studies. The  $L_{eq}$  is typically used to conduct impacts analysis under “worst-case” conditions.

### 3.11.2 Town of Clay Regulations

The Town of Clay has a noise ordinance to regulate noise levels in the community. Section 152-4 of the Town Code limits non-emergency construction activity to the hours between 7 a.m. to 7 p.m. weekdays and from 8 a.m. to 5 p.m. on Saturdays.

Section 152-4 also limits noise levels at property boundaries for steady state or “operational” noise to 52 dB(A) between 7 a.m. and 9 p.m., and to 45 dB(A) between 9 p.m. and 7 a.m. These limits apply to sources that emit sounds of consistent intensity.

Transient and impulsive or fluctuating sound sources are limited to 72 dB(A) between 7 a.m. and 9 p.m. and to 65 dB(A) between 9 p.m. and 7 a.m., as observed at the property line.

Section 230-17 Industrial Districts of the Town Zoning Code contains performance standards for all industrial districts. It states:



- (1) *“Noise. No land use activity shall emit noise measured at the property lines of the subject property exceeding 70 decibels between 6:00 a.m. and 10:00 p.m., or 60 decibels between 10:00 p.m. and 6:00 a.m. These maximum sound levels may be intermittently exceeded by not more than seven decibels for a maximum of six minutes during any sixty-minute period. Any land use activity on property that is entirely or partially within 500 feet of a Residential Zone District shall be subject to the more restrictive noise standards of either this section or of the Town of Clay Code, Chapter 152.”* (as stated above).

The Project’s relationship to the ordinance is discussed in Chapter 4, Section 4.11.1.1

### **3.11.3 Town of Cicero Regulations**

The proposed Project includes potential transportation improvements within the Town of Cicero. The Town of Cicero has a noise ordinance to regulate noise levels in the community. Section 143-5 of the Town Code limits non-emergency construction activity to the hours between 7 a.m. to 8 p.m. weekdays and from 8 a.m. to 8 p.m. on Saturdays, and it is presumed that any transportation improvements undertaken in Cicero will take place within these specified hours.

The Project’s relationship to the ordinance is discussed in Chapter 4, Section 4.11.1.1

### **3.11.4 Existing Conditions**

The proposed expansion of the Park to the east and the inclusion of roadway improvements have expanded the areas requiring noise impact analysis during construction and operation activities. Additionally, previously assumed background (ambient) sound levels have been adjusted to reflect measured sound levels.

Existing noise in the proposed expanded Park area is generated mostly by vehicular traffic on NYS Route 31 and adjacent roads. Occasional freight trains traveling along the existing CSX rail line near the site, including train signal horns at the existing Caughdenoy Road grade crossing, contribute to the sound environment. Other noise sources in the area include occasional activities such as use of farm tractors and lawn mowing equipment, and wildlife sources typical of a local residential environment.

Receptors potentially sensitive to noise in the Project site are generally single- and multi-family residential homes along Caughdenoy Road, NYS Route 31, Verplank Road, and surrounding roadways. Highly sensitive receptors such as schools, libraries, hospitals, and parklands do not exist near the Park, although two local parks are located to the west and southeast along NYS Route 31.

JMT collected confirmatory day-time ambient sound level data at five representative locations around the Project site on Thursday, April 8, 2021 and April 27, 2021. Data was collected with a Class 1 noise meter over two, non-consecutive 30-minute periods at each location to ensure representative samples. Ambient sound level monitoring locations are indicated on Figure 3.11-1, and sound level measurements are summarized in Table 3.11-1. Observed daytime ambient sound levels at representative locations ranged from 48.0 dB(A) to 73.5 dB(A). Observed average daytime ambient sound levels in the vicinity of the Park currently exceed daytime sound level limits specified in the Town of Clay noise code (Section 152-4). Sound level monitoring data sheets and field notes are provided in Appendix E.



Per NYSDEC guidance, nighttime noise levels in general are typically assumed to be about 10 decibels lower than daytime levels, depending on local land uses and sources of sound. Decibel levels in the mid-40s to mid-60s range are likely typical of quiet nighttime conditions within the proposed expanded Park. Assumed nighttime ambient sound levels are listed in Table 3.11-1.

Table 3.11-1: Ambient Noise Data										
Location	Date	Start Time	File #	Laeq (dB(A))	Date	Start Time	File #	Laeq (dB(A))	Average Daytime Ambient (dB(A))	Assumed Nighttime Ambient (dB(A))
A1	4/8/21	9:33	JMT.079	72.2	4/8/21	9:33	JMT.085	73.5	72.9	62.9
A2	4/8/21	10:30	JMT.081	60.8	4/8/21	10:30	JMT.087	65.3	63.6	53.6
A3	4/8/21	11:23	JMT.083	53.9	4/8/21	14:16	JMT.089	55.3	54.7	44.7
A4	4/27/21	10:29	JMT.091	69.7	4/27/21	12:59	JMT.094	70.0	69.9	59.9
A5	4/27/21	11:34	JMT.093	52.8	4/27/21	13:29	JMT.095	48.0	51.0	41.0

## 3.12 Human Health

Since the 2013 FGEIS, the SEQRA environmental assessment process has incorporated more specific questions about human health. Human health is not a quantifiable environmental resource with identifiable characteristics specific to the Project site. However, the SEQRA process takes human health into consideration through potential direct or indirect human health effects of a project considering certain nearby sensitive receptors, the potential to disturb contaminated soils, and potential waste generation of the project. Aspects of human health related to the generation, storage, and disposal of solid and hazardous waste are discussed in Chapter 10.

Human health considerations address potentially sensitive receptors in proximity to a project. The proposed expansion of the Park is within 1,500 feet of the recently built Cottages at Garden Grove Nursing home. This facility is approximately 200 feet east of the eastern site boundary and has a physical address of 5460 Meltzer Court, Cicero, NY. Grace Evangelical Covenant Church is also located south of the Project site at 5300 NYS Route 31 in the Town of Clay. The church, which has after-school programs for children, is located west of Burnet Road and about 2,500 feet west of a possible NYS Route 31 entrance to the expanded Park. Potential impacts and mitigation of impacts as they relate to human health are addressed in Section 4.12.

Past environmental spills of petroleum or chemicals at or adjacent to the Project site also have the potential to impact human health since contaminated soils could be disturbed during site construction. According to environmental records (ERIS Database Report)<sup>22</sup>, a small petroleum spill occurred on the

<sup>22</sup> Environmental Risk Information Services (ERIS). White Pine Property, Clay, NY (November 2020)



expanded Park site at the north end of Burnet Road in September 2020. This spill involved about 2 quarts of hydraulic oil. According to New York State Department of Environmental Conservation (NYSDEC) records, the spill was satisfactorily closed on September 20, 2020.

Over the last twenty years, five other small spills have occurred at the perimeter of the proposed expanded Park along NYS Route 31 or Caughdenoy Road. All the spills have been closed to the satisfaction of NYSDEC, and no further investigation or remediation is required. Three of the spills were associated with motor vehicle incidents between 1999 and 2009. They involved spilled quantities of gasoline (10-15 gallons) or hydraulic fluid (4 gallons). Another incident in 2012 at the Clay Substation along Caughdenoy Road, was related to an equipment malfunction. It is reported that one gallon of petroleum leaked and was fully recovered. This past spill could be in the vicinity of the new electric line to be installed beneath Caughdenoy Road. However, it is not anticipated to impact that work since the small amount of leaked petroleum was fully cleaned up. The fifth spill was associated with the detection of petroleum contaminated soil that was discovered while digging a foundation in 2001 near the intersection of NYS Route 31 and Caughdenoy Road. The contaminated soil was removed. It is possible that a section of a new sewer line could be installed in this area.



Table 3.5-1 Soil Characterization												
Symbol	Name	Soil Capability Class <sup>1</sup>	Mineral Soil Group <sup>2,4</sup>	Hydric Soil	Farmland Classification <sup>3</sup>	Drainage Class <sup>1</sup>	Depth to Water Table <sup>3</sup>	Rating for Shallow Excavation <sup>3</sup>	Rating for Lawns & Landscaping <sup>3</sup>	Rating for Local Roads <sup>3</sup>	Rating for Commercial Buildings <sup>3</sup>	% of the Expanded Site
AoA	Applenton loam, 0 to 3% slopes	3	5	No	Prime farmland if drained	Somewhat poorly drained	6-18"	Very Limited (depth to saturated, cobbles/cave, dense layer)	Very Limited (depth to saturated zone, low exchange capacity, dusty)	Very Limited (frost action, depth to saturated zone)	Very Limited (depth to saturated zone)	0.9
Cd	Cananagusa mucky silt loam	3	7	Yes	Farmland of statewide importance	Poorly drained	0"	Very Limited (ponding, depth to saturated zone)	Very Limited (ponding, depth to saturated zone)	Very limited (ponding, depth to saturated zone, frost action)	Very Limited (ponding, depth to saturated zone)	7.4
ChA	Collamer silt loam, 0 to 2% slopes	2	2	No	All areas are prime farmland	Moderately well drained	18-24"	Very Limited (depth to saturated zone, dusty, unstable excavation walls)	Somewhat Limited (depth to saturated zone)	Very Limited (frost action, depth to saturated zone, low strength)	Somewhat Limited (depth to saturated zone)	3.4
ChB	Collamer silt loam, 2 to 4% slopes	2	3	No	All areas are prime farmland	Moderately well drained	18-24"	Very Limited (depth to saturated zone, dusty, unstable excavation walls)	Somewhat Limited (depth to saturated zone)	Very limited (frost action, depth to saturated zone, low strength)	Somewhat limited (depth to saturated zone)	25.2
DuC	Dunkirk silt loam, rolling	3	4	No	Farmland of statewide importance	Well drained	More than 80"	Very Limited (depth to saturated zone, dusty, unstable excavation walls)	Somewhat Limited (low exchange capacity, slope, dusty)	Very Limited (frost action, slope)	Very Limited (slope)	0.6
FL	Fluvaquents, frequently flooded	5	9	Yes	Not prime farmland	Poorly drained	0"	Very Limited (ponding, depth to saturated zone, flooding, unstable excavation walls, dusty)	Very Limited (ponding, depth to saturated zone, dusty)	Very Limited (ponding, depth to saturated zone, frost action, flooding)	Very Limited (ponding, flooding, depth to saturated zone)	1.1
Fo	Fonda mucky silty clay loam	4	7	Yes	Not prime farmland	Very poorly drained	0"	Very Limited (ponding, depth to saturated zone, dusty, unstable excavation walls)	Very Limited (ponding, organic matter content, depth to saturated zone, dusty)	Very Limited (ponding, depth to saturated zone, subsidence, frost action, low strength)	Very Limited (ponding, subsidence, depth to saturated zone)	0.9
HIA, HB	Hilton loam, 0 to 8% slopes	2	2	No	All areas are prime farmland	Moderately well drained	18-24"	Very Limited (depth to saturated zone, unstable excavation walls, dusty)	Somewhat Limited (low exchange capacity, depth to saturated zone, dusty)	Somewhat Limited (frost action, depth to saturated zone)	Somewhat limited (depth to saturated zone, slope)	5.8
MdC	Madrid fine sandy loam, 8 to 15% slopes	3	5	No	Farmland of statewide importance	Well drained	More than 80"	Somewhat Limited (slope, unstable excavation walls)	Somewhat Limited (low exchange capacity, slope)	Somewhat Limited (slope, frost action)	Very Limited (slope)	0.9
MAA	Minoa	3	5	No	Prime farmland if drained	Somewhat poorly drained	6-18"	Very Limited (depth to saturated zone, unstable excavation walls)	Somewhat Limited (depth to saturated zone, low exchange capacity)	Very Limited (frost action, depth to saturated zone)	Very Limited (depth to saturated zone)	0.2
NgA	Niagara silt loam, 0 to 4% slopes	3	4	No	Prime farmland if drained	Somewhat poorly drained	6-18"	Very Limited (depth to saturated zone, dusty, unstable excavation walls)	Somewhat Limited (depth to saturated zone, low exchange capacity, dusty)	Very Limited (frost action, depth to saturated zone)	Very Limited (depth to saturated zone)	38.1
OgB	Ontario loam, 2 to 8% slopes	2	2	No	All areas are prime farmland	Well drained	More than 80"	Somewhat Limited (unstable excavation walls, dusty)	Somewhat Limited (low exchange capacity, dusty)	Somewhat Limited (frost action)	Somewhat Limited (slope)	3.1
OgC	Ontario gravelly loam, 8 to 15% percent slopes	3	5	No	Farmland of statewide importance	Well drained	More than 80"	Somewhat Limited (slope, unstable excavation walls, dusty)	Somewhat Limited (slope, low exchange capacity, dusty)	Somewhat Limited (slope, frost action)	Very Limited (slope)	0.5
Pb	Palms	5	10	Yes	Not prime farmland	Very poorly drained	0"	Very Limited (ponding, depth to saturated zone, dusty, unstable excavation walls)	Very Limited (ponding, organic matter content, depth to saturated zone, dusty)	Very Limited (ponding, depth to saturated zone, subsidence, frost action, low strength)	Very Limited (ponding, subsidence, depth to saturated zone)	6.4
Rh	Rhinebeck silt loam	3	5	No	Prime farmland if drained	Somewhat poorly drained	6-18"	Very Limited (depth to saturated zone, too clayey, dusty, unstable excavation walls)	Somewhat Limited (depth to saturated zone, dusty)	Very Limited (frost action, low strength, depth to saturated zone, shrink-swell)	Very Limited (depth to saturated zone, shrink-swell)	2.9
WdB	Williamson silt loam, rolling or 2 to 6% slopes	2	4	No	All areas are prime farmland	Moderately well drained	13-22"	Very Limited (depth to saturated zone, dusty, unstable excavation walls)	Very Limited (low exchange capacity, depth to saturated zone, dusty)	Very Limited (frost action, depth to saturated zone, slope)	Very Limited (depth to cemented pan, depth to saturated zone, slope)	1.9
WwC	Williamson silt loam, rolling	3	5	No	Farmland of statewide importance	Moderately well drained	13-22"	Very Limited (depth to saturated zone, slope, dusty, unstable excavation walls)	Very Limited (low exchange capacity, depth to saturated zone, slope, dusty)	Very Limited (frost action, depth to saturated zone, slope)	Very Limited (depth to cemented pan, depth to saturated zone, slope)	0.3

Notes

1. Natural Resources Conservation Service (NRCS) classifies soils into capability classes based upon their potential for agricultural productivity (USDA Soil Survey of Onondaga County, NY)

2. 2021 New York State Master List of Agricultural Soils, Onondaga County, <https://agriculture.ny.gov/system/files/documents/2021/01/masterlistagriculturalsoils.pdf>

3. Source: Onondaga County Soil Survey

4. New York State Mineral Soil Groups (1 CSR,NY 370.8)

Soil Productivity Index	Soil Group
80 – 100	1
60 – 80	2
70 – 79	3
60 – 69	4
50 – 59	5
40 – 49	6
30 – 39	7
20 or less - Marginal cultivated uses	8
Soils not suitable for pasture or other cultivated uses and not identified above or below	9
Marsh, wetlands and organics not farmed	10





**Figure 3.8-2:**  
**Utility Corridor Wetlands**

**Legend**

- ▬ White Pine Site Boundary
- ▬ Proposed Gas Line
- ▬ Proposed Sewer Line
- ▨ Wetlands 2013 FGEIS
- ▬ NYSDEC Wetlands
- ▬ NYSDEC Wetlands Checkzones
- National Wetland Inventory**
  - ▬ Freshwater Forested/Shrub Wetland
  - ▬ Freshwater Emergent Wetland
  - ▬ Freshwater Pond
  - ▬ Riverine

Wetlands 2013 FGEIS: Wetlands delineation was conducted by Terrestrial Environmental Specialists (TES), Inc. in June of 2013.

0 0.2 0.4 Miles

Scale: 1" = 0.20 mile

Date Printed: 4/27/2021

**Data Sources:**  
New York State, Maxar, Esri Community Maps Contributors, Esri Canada, Esri, HERE, Garmin, SafeGraph, INCREMENT P, METI/NASA, USGS, EPA, U.S. Fish and Wildlife Service, National Standards and Support Team, wetlands\_team@fws.gov | New York State, Maxar | Esri, HERE, Garmin  
NYS Department of Environmental Conservation, Environmental Resource Mapper, State Regulated Wetlands





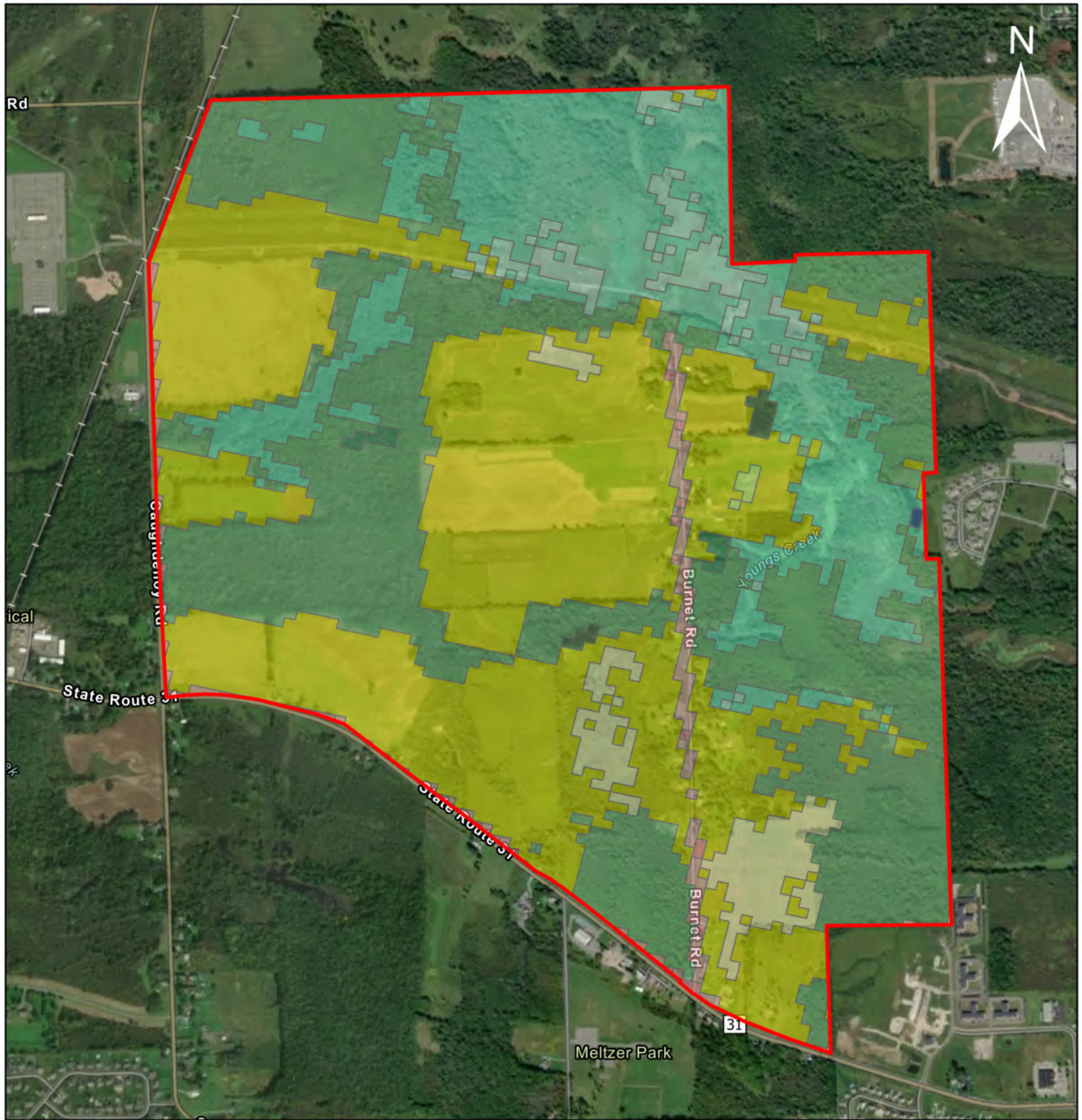


Figure 3.8-2:  
Land Cover Types

0 0.13 0.25 Miles  
Scale: 1 inch = .25 miles

Date Printed: 4/26/2021

Data Sources: New York State, Maxar, Esri Community Maps Contributors, Esri Canada, Esri, HERE, Garmin, SafeGraph, INCREMENT P, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA  
[https://utility.arcgis.com/usrvcs/servers/296c2474ac94415dab80067c3f5ffe94/services/USA\\_NLCD\\_Land\\_Cover/ImageServer](https://utility.arcgis.com/usrvcs/servers/296c2474ac94415dab80067c3f5ffe94/services/USA_NLCD_Land_Cover/ImageServer)

### Legend

- |  |   |
|--|---|
| <span style="border: 2px solid red; display: inline-block; width: 20px; height: 10px;"></span> White Pine Site Boundary    | <span style="display: inline-block; width: 20px; height: 10px; background-color: #4682b4;"></span> Mixed Forest                 |
| <span style="display: inline-block; width: 20px; height: 10px; background-color: #add8e6;"></span> Open Water              | <span style="display: inline-block; width: 20px; height: 10px; background-color: #90ee90;"></span> Shrub/Scrub                  |
| <span style="display: inline-block; width: 20px; height: 10px; background-color: #f5deb3;"></span> Developed Open Space    | <span style="display: inline-block; width: 20px; height: 10px; background-color: #ffff00;"></span> Pasture/Hay                  |
| <span style="display: inline-block; width: 20px; height: 10px; background-color: #ffb6c1;"></span> Developed Low Intensity | <span style="display: inline-block; width: 20px; height: 10px; background-color: #ffff00;"></span> Cultivated Crops             |
| <span style="display: inline-block; width: 20px; height: 10px; background-color: #90ee90;"></span> Deciduous Forest        | <span style="display: inline-block; width: 20px; height: 10px; background-color: #4682b4;"></span> Woody Wetlands               |
| <span style="display: inline-block; width: 20px; height: 10px; background-color: #6b8e23;"></span> Evergreen Forest        | <span style="display: inline-block; width: 20px; height: 10px; background-color: #add8e6;"></span> Emergent Herbaceous Wetlands |





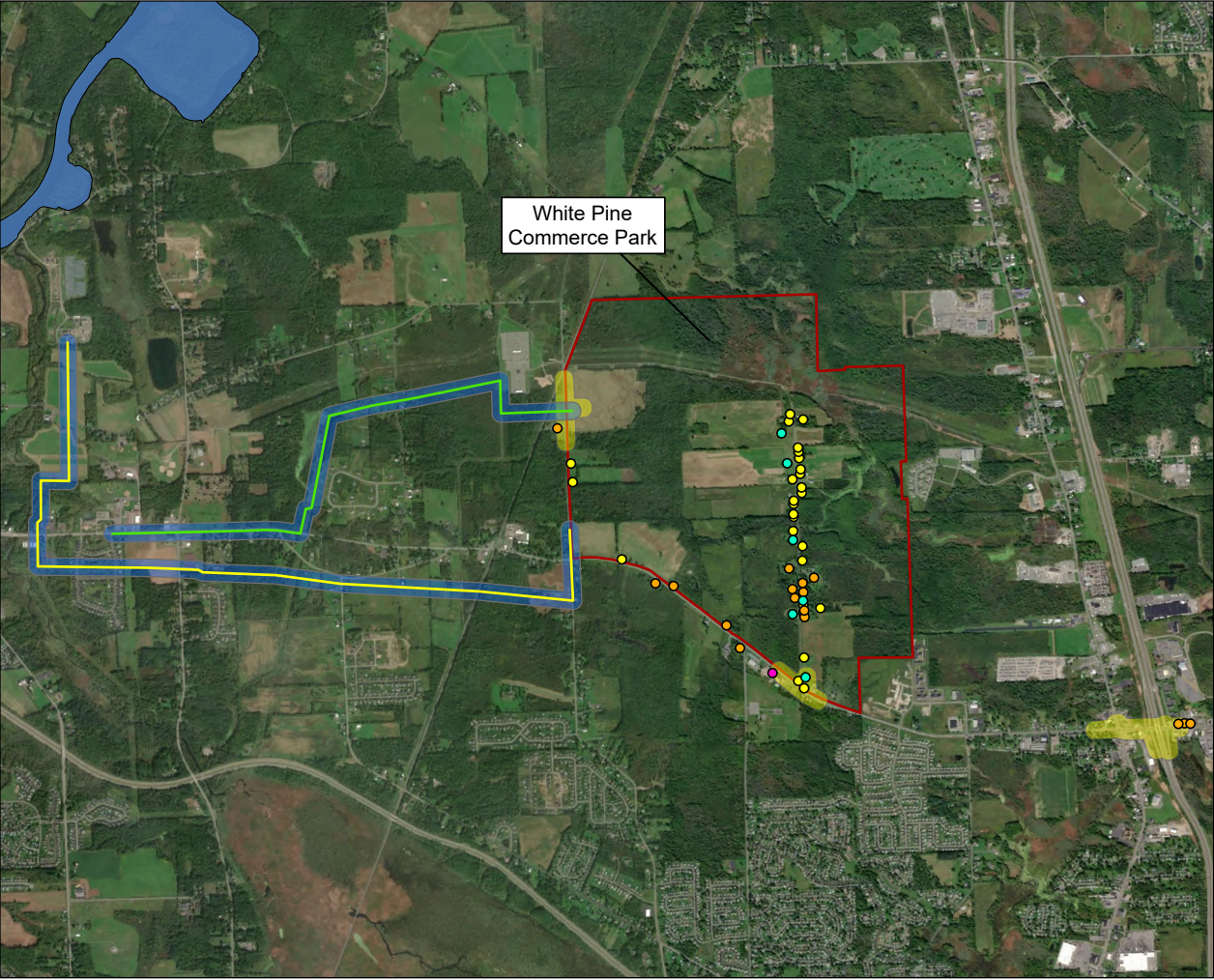
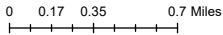
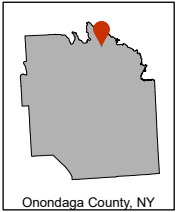


Figure 4.9-1:  
**Architectural  
Resources**  
White Pine Commerce Park  
Onondaga County Industrial  
Development Agency

**Legend**

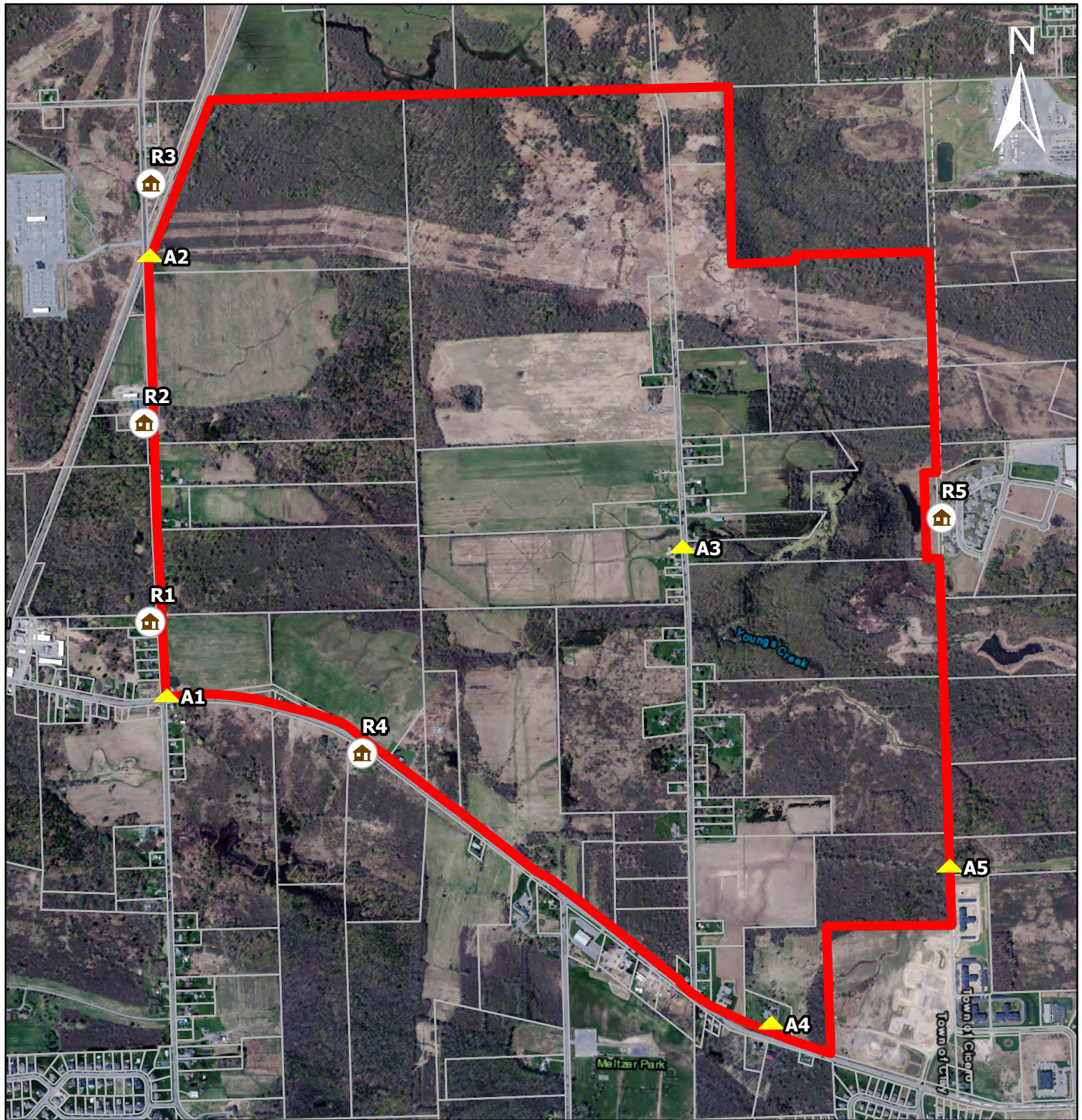
- Non-Historic
- Not Eligible (per SHPO)
- Unevaluated (per SHPO)
- Previously Unsurveyed
- Proposed Gas Line
- Proposed Sewer Line
- Roadway Improvement APE
- Utility 200' APE
- White Pine Commerce Park Site



Date Printed:  
Data Sources:  
New York State, Maxar







**Figure 3.11-2:**  
**SOUND LEVEL MONITORING**  
**AND RECEPTOR LOCATIONS**

0    0.13    0.25 Miles  
 Scale: 1 inch = 0.25 miles  
 Date Printed: 4/27/2021 3:42  
 Data Sources:  
 Esri, HERE, Garmin, iPC;  
 Parcel data obtained from Syracuse-Onondaga County Planning Agency on 2/25/21  
 Note: All boundaries and locations are approximate where shown.

- Legend**
- White Pine Commerce Park
  - Parcel Boundaries
  - ▲ Ambient Monitoring Locations
  - 🏠 Noise Receptors







White Pine  
Commerce Park

## Legend

 White Pine Commerce Park Site

### Land Use

-  Agricultural
-  Commercial
-  Industrial/Utility
-  Parks/Open Space
-  Public Service
-  Residential
-  Vacant



Onondaga County, NY

Figure 3.1-1

## Existing Land Use

White Pine Commerce Park

Onondaga County Industrial Development Agency

Date Printed: 4/25/2021

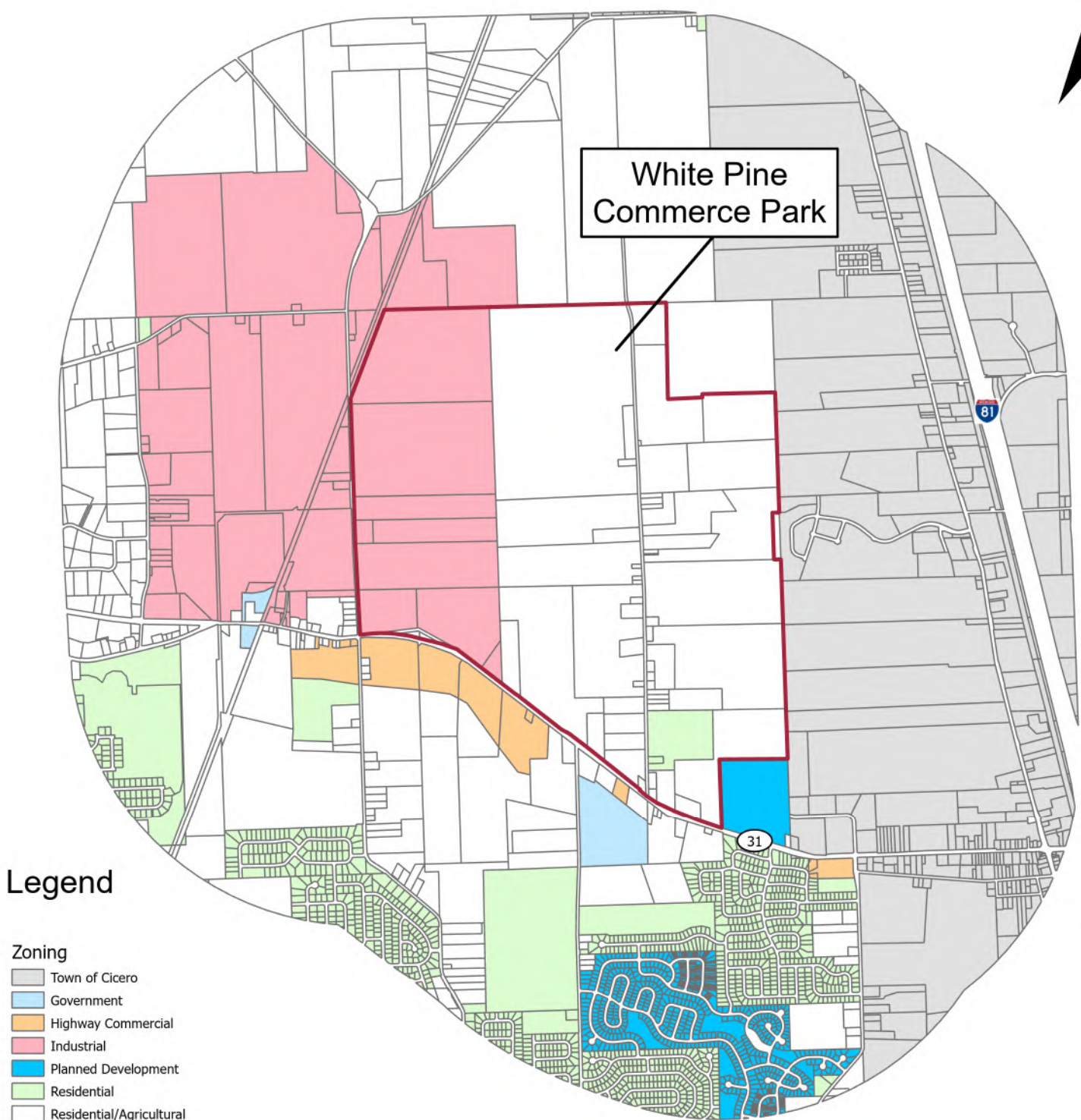
Data Sources: Onondaga County parcel data provided by SOCPA, Town of Clay Zoning Data (2016),

Note: Map shows land uses within 1-mile buffer of White Pine Commerce Park.

0 0.25 0.5 Miles

Scale: 1 inch = .5 miles





Onondaga County, NY

Figure 3.1-2

## Existing Zoning Map

White Pine Commerce Park

Onondaga County Industrial Development Agency

Date Printed: 4/25/2021

Data Sources: Onondaga County Parcel Data provided by SOCPA,  
Town of Clay Zoning Data (2016)

0 0.25 0.5 Miles

Scale: 1 inch = .5 miles



**DMT**



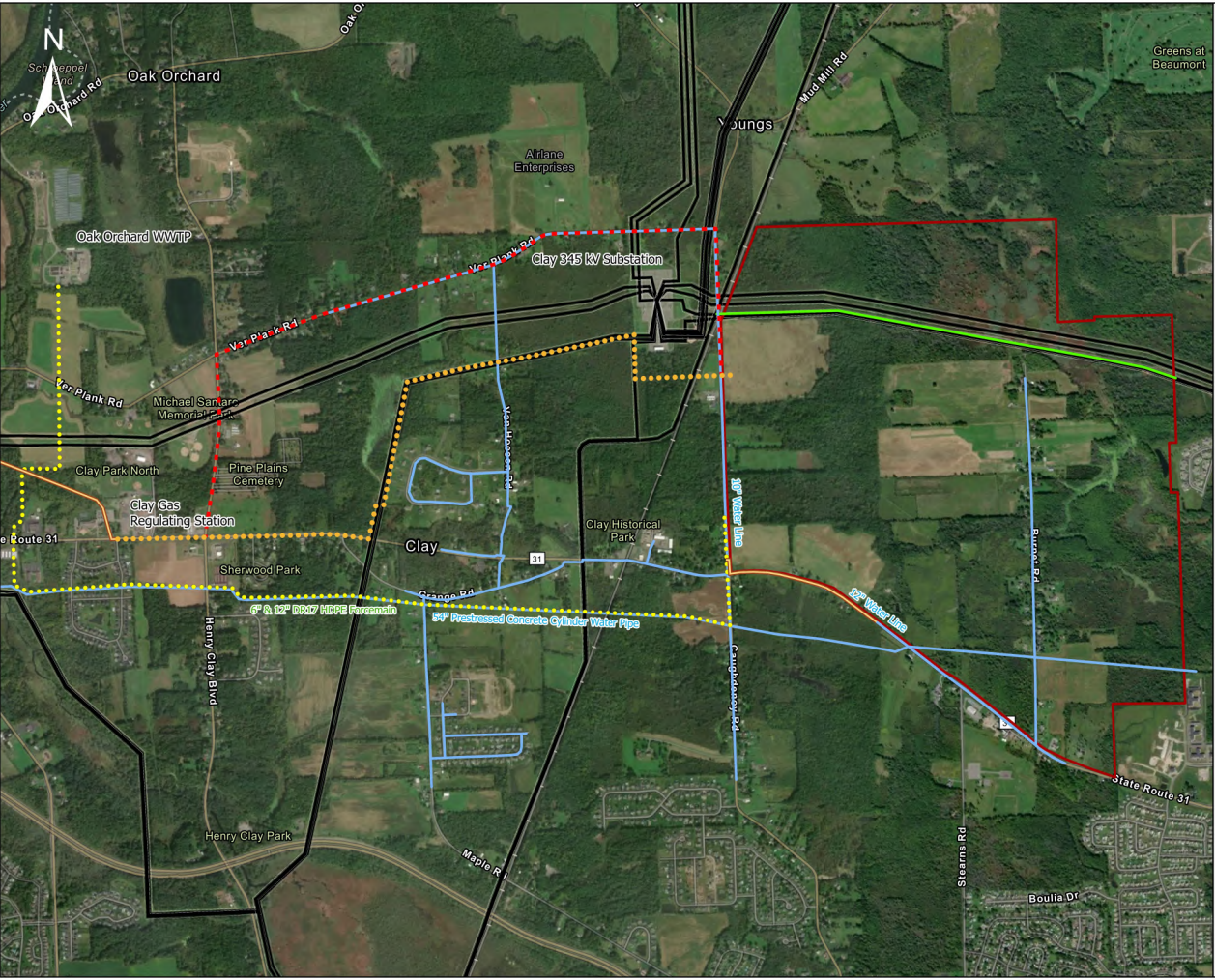


Figure 3.4-1  
Existing and  
Proposed Utilities

White Pine Commerce Park  
Onondaga County Industrial  
Development Agency

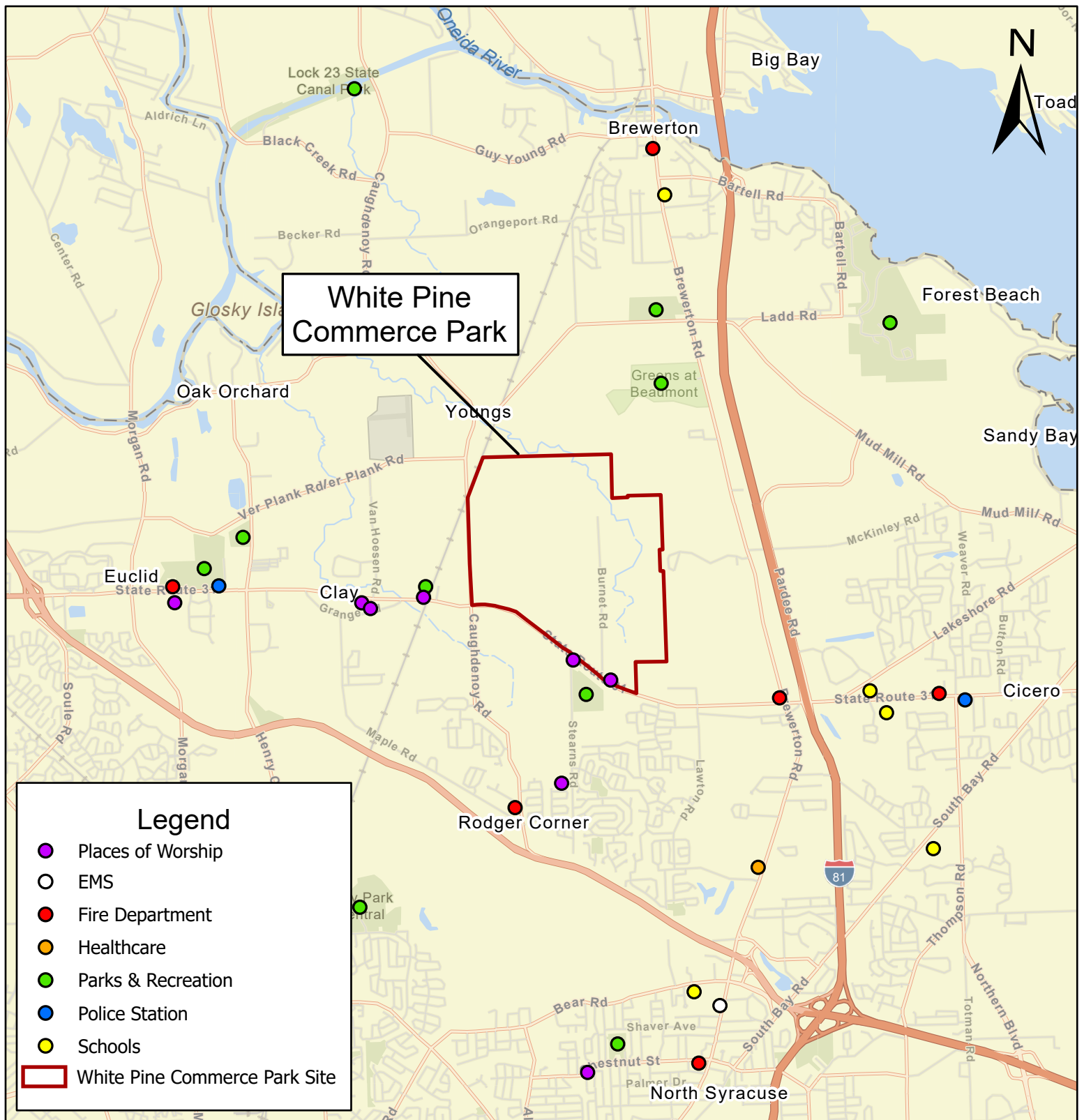
- Legend**
- Proposed Gas Line Route
  - Alternative Gas Line Route
  - Existing Gas Pipeline
  - Proposed Sewer Line
  - Water Line
  - Existing Transmission Lines
  - Fiber-Optic Line
  - White Pine Commerce Park Site

0 0.25 0.5 Miles  
Scale: 1 Inch = 0.3 Mile

Date Printed: 4/26/2021 5:02 PM

Data Sources:  
New York State, Maxar, Esri Canada,  
Esri, HERE, Garmin, SafeGraph,  
INCREMENT P, METI/NASA, USGS,  
EPA, NPS, US Census Bureau, USDA  
Ramboll US Corp. (3/19/21),  
NYS Electric Transmission  
Lines of 115kv and above.  
Digitized from NYPP map  
(2010) at 1:1,000,000 scale.







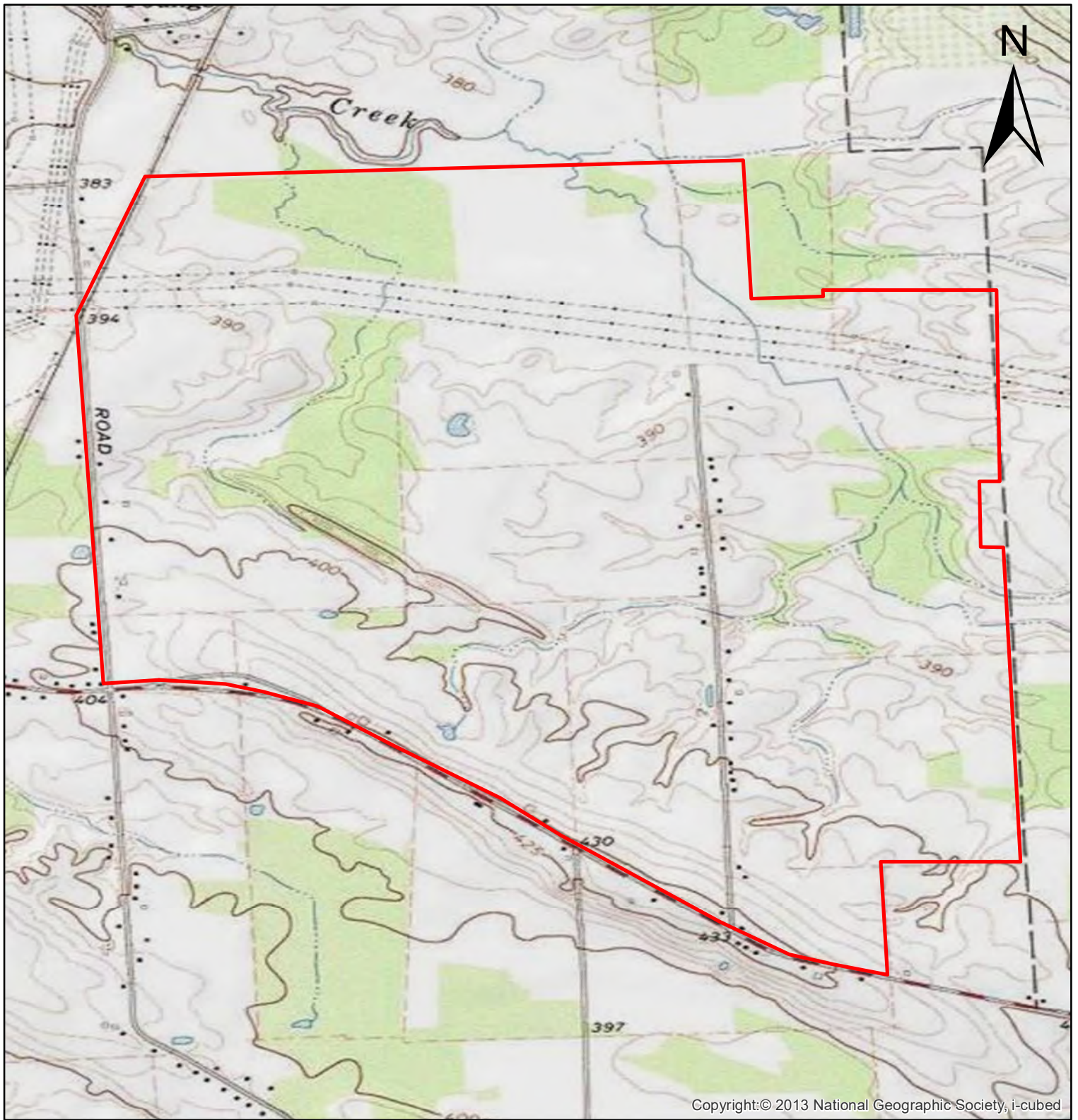


Figure 3.5-1:  
Topography

Legend

White Pine Commerce Park

0 0.25 0.5 Miles

Scale: 1 inch = 0.5 miles  
Date Printed: April 21, 2021  
Data Sources: ESRI, National Geographic Society



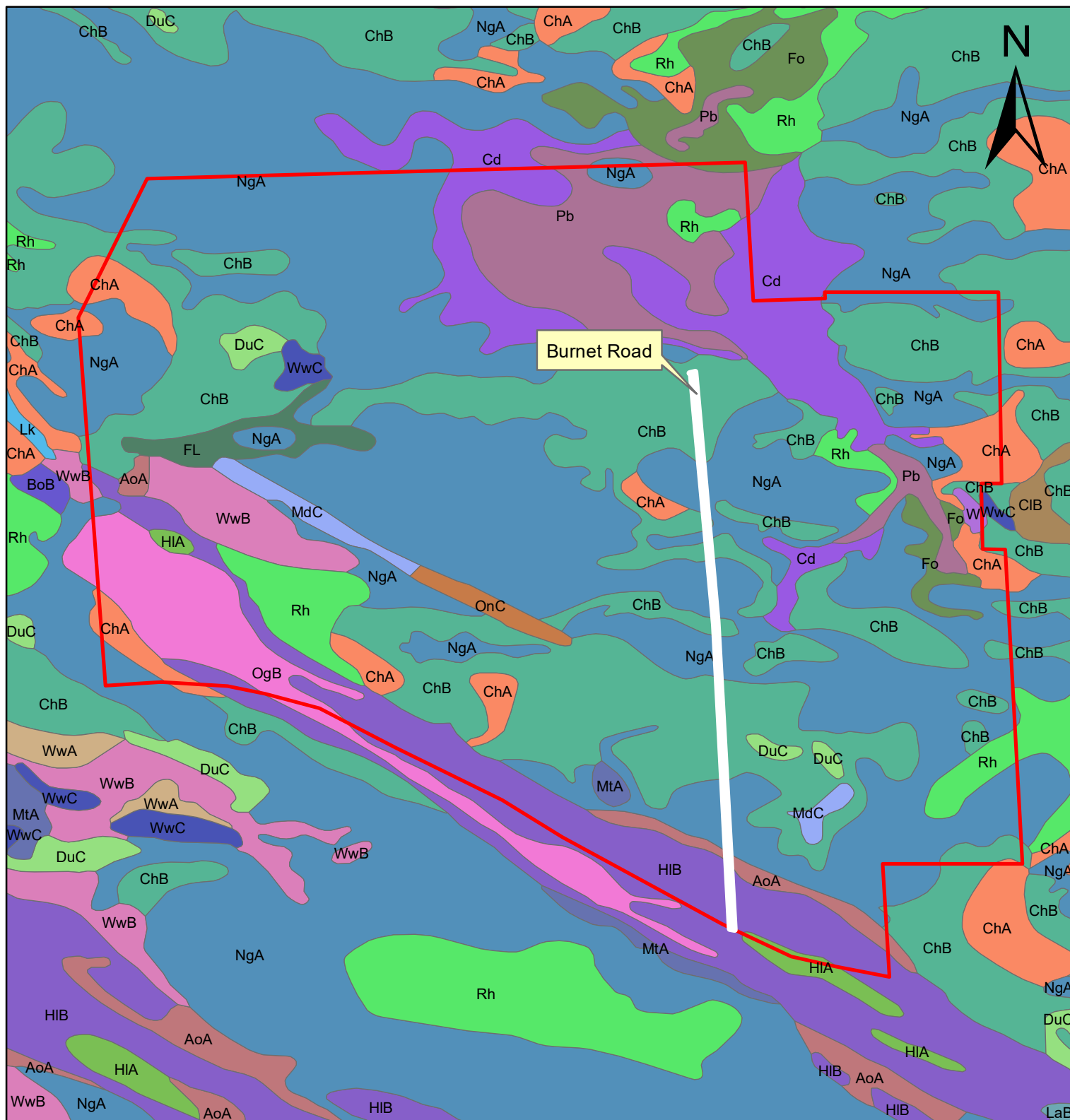


Figure 3.5-2:  
Soils

### Legend

White Pine Commerce Park

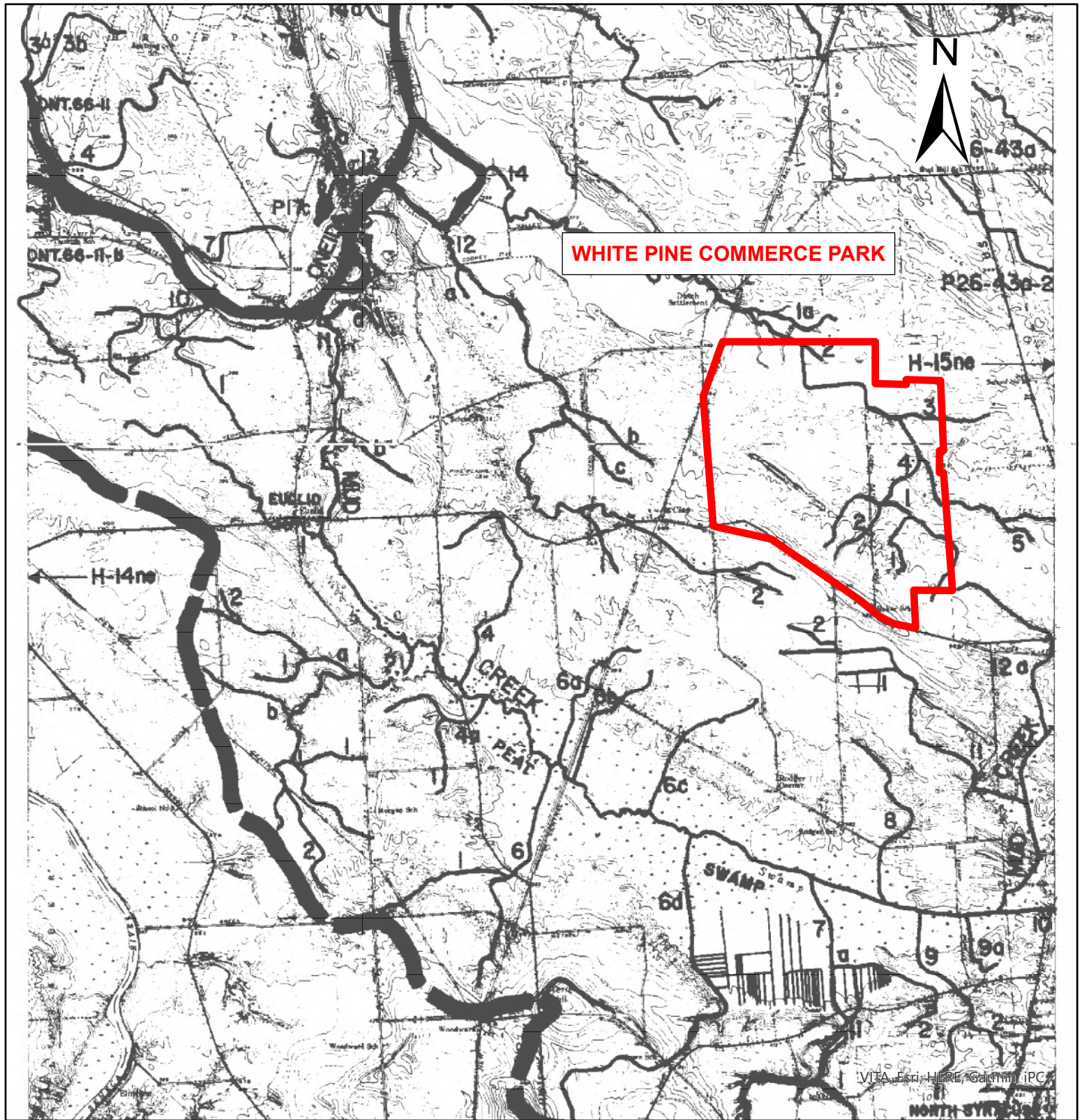
0 0.25 0.5 Miles

Note:  
Refer to Table 3.5-1 for Soil Abbreviations

Scale: 1 inch = 0.5 miles  
Date Printed: April 21, 2021  
Data Sources: ESRI, CUGIR, Soil Survey Geographic SSURGO Database







**Figure 3.6-1:**  
**NYSDEC STREAM CLASSIFICATIONS**  
**QUADRANGLE MAP H-15nw**

NOT TO SCALE

Date Printed: 4/22/2021

Data Sources:

NYSDEC Title 6 NYCRR, Chapter X, Article 14, Part 899.7 (1994), Map H-15nw Article 14, Part 899.7 (1994) Map H-15nw

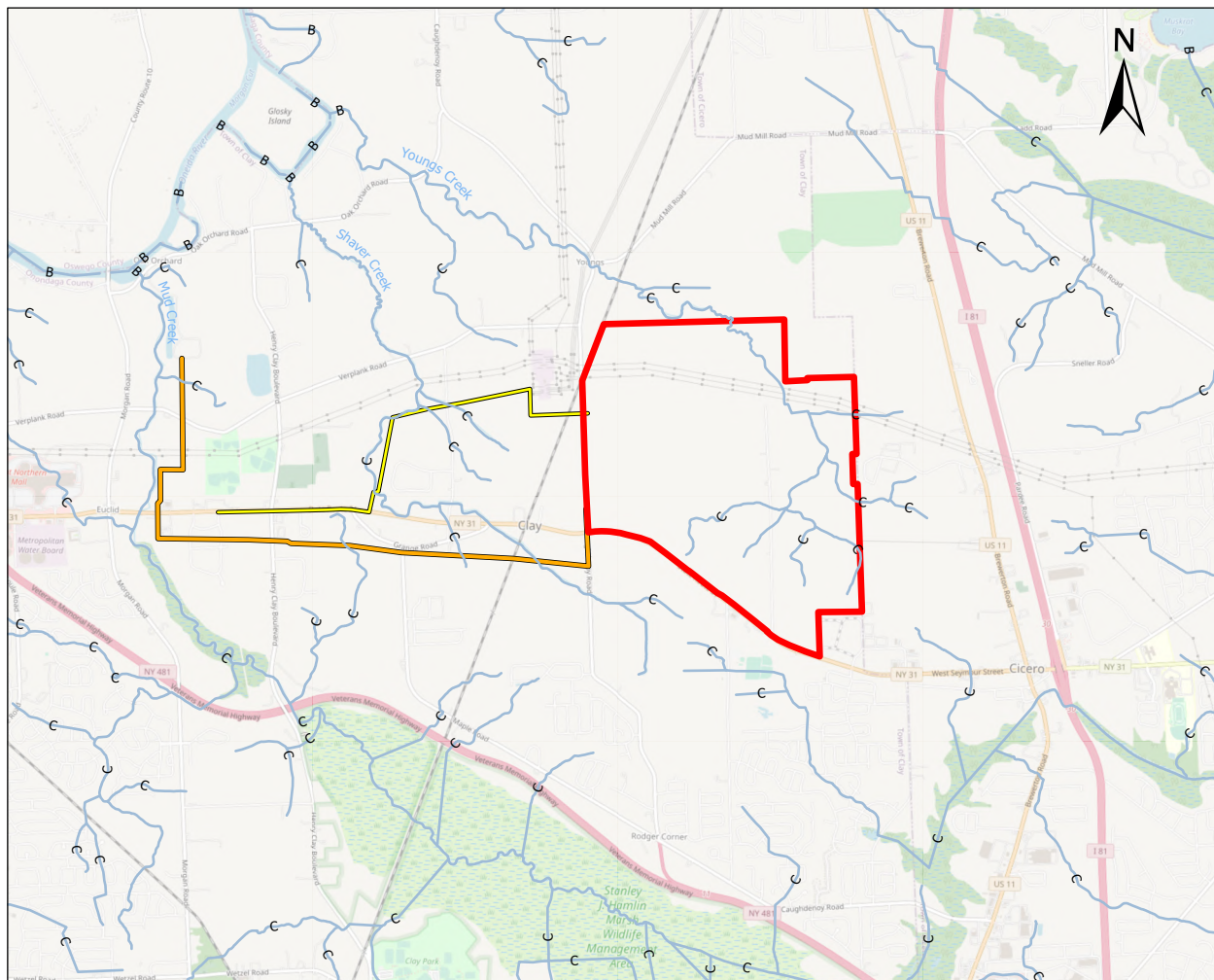
Boundaries are approximate where shown.

### Legend

  White Pine Commerce Park







**Figure 3.6-2:**  
**WATER QUALITY**  
**CLASSIFICATIONS**

White Pine Commerce Park  
Onondaga County Industrial  
Development Agency

#### Legend

- ▬ White Pine Commerce Park
- ▬ Proposed Sewer Line
- ▬ Proposed Gas Line
- ▬ NYSDEC Water Classifications

0 0.5 1 Miles

Scale: 1 Inch = 0.5 Mile

Date Printed: 4/22/2021

#### Data Sources:

© OpenStreetMap (and) contributors, CC-BY-SA;

Water Quality Classifications (WQC) data from  
NYS Department of Environmental Conservation,  
Division of Water, Bureau of Water Assessment  
and Monitoring, dated 4/13/2010, last revised  
May 2019.

All boundaries and locations are approximate  
where shown.



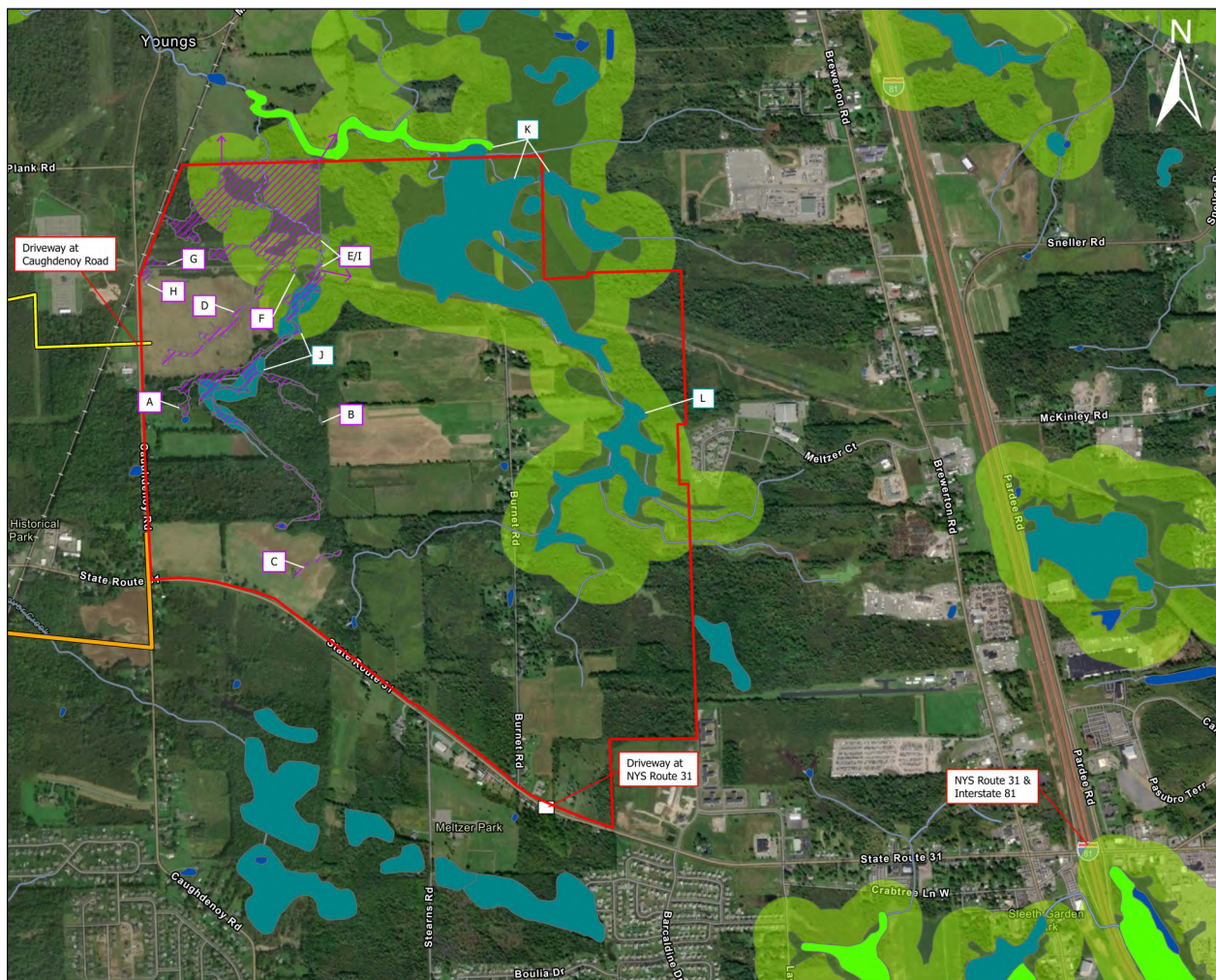


Figure 3.8-1:  
Site Wetlands

#### Legend

- White Pine Site Boundary
  - Proposed Gas Line
  - Proposed Sewer Line
  - Wetlands 2012 GEIS
  - NYSDEC Wetlands
  - NYSDEC Wetlands Checkzones
- National Wetland Inventory**
- Freshwater Forested/Shrub Wetland
  - Freshwater Emergent Wetland
  - Freshwater Pond
  - Riverine

Wetlands 2012 GEIS: Wetlands delineation was conducted by Terrestrial Environmental Specialists (TES), Inc. in July of 2010.

0 0.25 0.5 Miles

Scale: 1" = 0.25 mile

Date Printed: 4/27/2021

Data Sources:  
 New York State, Maxar, Esri Community Maps Contributors, Esri Canada, Esri, HERE, Garmin, SafeGraph, INCREMENT P, METI/NASA, USGS, EPA, U.S. Fish and Wildlife Service, National Standards and Support Team, wetlands\_team@fws.gov | New York State, Maxar | Esri, HERE, Garmin  
 NYS Department of Environmental Conservation, Environmental Resource Mapper, State Regulated Wetlands





## 4.0 POTENTIAL ENVIRONMENTAL IMPACTS AND MITIGATION

### 4.1 Land Use & Zoning

#### 4.1.1 Impacts

Development of the proposed expanded Park is partially consistent with existing Town of Clay land use and zoning regulations. The existing Park is presently zoned I-2, which will allow for the types of uses, specifically tenants in the semiconductor industry, intended for the Park. The majority of the remaining lands that comprise the proposed expanded Park are zoned RA-100 and RA-15, which only allow uses that are inconsistent and incompatible with the objectives of the Project. The Project will therefore require either a zone change to I-2 for the portion of the expanded Park that is zoned differently or the creation of a PDD that encompasses the entire expanded Park. OCIDA will work with the Town of Clay to obtain rezoning approval for those portions of the Park which are not currently zoned compatibly for the Project.

The change in zoning classification required for the expanded Park will result in the conversion of residentially zoned property to allow industrial uses. The change will enable the expanded Park to be developed in a manner that is not currently permitted under the Town of Clay Zoning Code and will introduce land uses that were previously limited to the existing Park as evaluated in the 2013 FGEIS. Specifically, the Project will result in the expansion of industrial land uses and associated improvements beyond the bounds of the existing Park on primarily undeveloped land. The Project will extend the I-2 district or a PDD east and north within the Town of Clay, thus bringing potential future industrial development closer to residential properties along NYS Route 31 to the east, as well as the Town of Cicero border.

#### 4.1.2 Mitigation

In furtherance of the Project, OCIDA will pursue approval by the Town of Clay Town Board of either a zone change to I-2 for the portion of the Park that is not zoned I-2 or a PDD that encompasses the entire Park footprint to allow the type of uses OCIDA seeks for the Park. If a zone change to I-2 is obtained, future development of the Park must comply with the specific use, performance, and design requirements for that district. Additionally, the potential future development of the Park will be subject to site plan review and approval by the Town of Clay Planning Board, which may require alterations of the plan and impose specific design or other conditions associated with such development to ensure compliance with the Zoning Code. Visual buffering (e.g., retention of existing trees in certain areas), building and site design features, and other Project-related issues will be reviewed and coordinated as part of any future development to avoid and/or minimize potential adverse impacts to nearby properties.

Alternatively, if OCIDA opts to pursue PDD approval for the expanded Park, a similar result would occur. OCIDA, a potential future developer, and the Town of Clay would work collaboratively to customize the development of the Park in ways that are not permitted or feasible in the I-2 district. Development standards that are typically applicable to existing zoning districts would not exist and would instead be established jointly with the Town through meetings with the Town Board and Planning Board in accordance with the Zoning Code. Such standards and requirements would be created with an eye



toward minimizing potential adverse impacts associated with development and use of the Park while also maximizing the opportunities presented by the expanded Park. Similar to site plan review above, the Town of Clay would take efforts to ensure that specific features and mitigation measures are incorporated into the design and function of the future site development.

Regardless of whether OCIDA seeks a zone change or PDD approval, the Town of Clay's review of any application concerning the future use and development of the expanded Park in the context of this SGEIS will determine whether all potential adverse impacts associated with the application and future use are adequately addressed and evaluated in this document in accordance with the requirements of SEQRA.

According to the most recent studies conducted by the Town of Clay (*Town of Clay Northern Land Use Study, 2013*), SOCPA (*2010 Development Guide for Onondaga County*), and SMTC (*Clay-Cicero Route 31 Transportation Study, 2010*), commercial development in the northern suburbs of Onondaga County is likely to continue. The studies also account for future industrial use of the Park. Additionally, SOCPA is currently updating the County's Comprehensive Plan and expects to finalize the plan later this year. Based on information obtained from SOCPA on April 7, 2021, the Comprehensive Plan will promote new opportunities to strengthen communities and options near the Park, including the creation of town centers, enhanced transit and transportation options, and complete neighborhoods concepts. Once a future tenant is identified for the Park, the County Comprehensive Plan will be reviewed to identify any goals or objectives from the Plan that should be considered for implementation into the future development of the Park.

## 4.2 Community Character

### 4.2.1 Impacts

The Development of the proposed expanded Park would alter the undeveloped rural character of the Project site and introduce industrial land uses and associated structures and improvements. This was contemplated for the current Park in the 2013 FGEIS, but the proposed Park expansion will extend potential future industrial development to additional lands not previously evaluated in 2013, thereby increasing the footprint of industrial use, as well as the potential adverse impacts associated with such use. Potential future development will introduce new buildings, parking lots, and other industrial support facilities and infrastructure to the expanded Park.

With the expansion of the Park approximately 3 dozen residential properties will be acquired by negotiated purchase or pursuant to the EDPL and these homeowners will need to relocate. The properties to be acquired along NYS Route 31 and Burnet Road represent a significant portion of the expanded Park's prime developable area (depicted on Figure 1.1-2) and are therefore a necessary component of the Project. It is anticipated that development of the Park will be largely contained within this area. Existing structures and improvements will ultimately be demolished and/or removed in furtherance of future development. Demolition activities will be conducted in accordance with Town of Clay requirements, and all debris will be disposed of at authorized off site facilities in accordance with applicable regulations. The telecommunications tower will need to be disassembled and relocated.





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Author:Dennis R. Roote, P.E. Subject:Highlight Date:6/11/2021 12:21:49 PM

A development time-frame needs to be developed.

Assuming that future development is contained within the prime developable area to avoid interference with wetlands and existing public utility improvements and/or rights-of-way and taking into consideration existing I-2 zoning district standards and requirements, it is anticipated that approximately 400 acres of the expanded Park would be developed with buildings, roads/parking areas, industrial infrastructure and ancillary facilities. The remainder of the Park would remain essentially undeveloped with vegetated buffers and pervious surfaces to maintain a natural appearance.

#### 4.2.2 Minimization and Mitigation

To avoid or minimize potential adverse impacts to the extent practicable, the potential future development of the expanded Park will occur subject to the design features, conditions, and mitigation measures required by the Town of Clay Town and Planning Boards in accordance with the requirements of the Zoning Code. In conjunction with either a zone change or PDD approval process, OCIDA will work with the Town Board and/or Planning Board to identify specific issues or areas of concern and develop specific measures to address or alleviate such concerns to ensure the objectives of the Project are achieved while also minimizing or mitigating development related impacts on the surrounding community.

Undeveloped portions of the Park will likely be maintained as wetlands, vegetated greenspace and integrated into stormwater management and other site design features. Additionally, greenspace would be used to meet setback requirements or other design thresholds that may be included in a PDD or site plan. Greenspace may also be incorporated in the tenant facility design/layouts to serve aesthetic purposes, establishing a campus-like setting for tenant employees and visitors.

With respect to the acquisition and removal of residential properties to enable the creation and future development of the expanded Park, OCIDA will negotiate to purchase these properties at fair market value and pay the seller's normal transaction costs of updating the title and survey, recording fees, transfer taxes and other similar expenses in connection with the transfer of these properties as well as the pro rata portion of real property taxes, water rents, sewer rents, special ad valorem charges and other similar charges. In the event it is necessary to acquire any such properties pursuant to the EDPL, as condemnor OCIDA will offer just compensation based on the fair market value determined by its highest approved appraisal, and the respective property owners will have the right to challenge the amount of such just compensation under EDPL Article 5. OCIDA will also pay, upon acquisition, any costs associated with recording fees, transfer taxes, penalties incurred by the condemnee for prepayment of any preexisting recorded mortgage entered into in good faith encumbering the property, and the pro rata portion of real property taxes, water rents, sewer rents, special ad valorem taxes and other similar charges.

### 4.3 Transportation

To assess future traffic conditions after the potential development is constructed on the proposed expanded Park, it is necessary to estimate the traffic volumes generated by proposed Project developments other than the Park and the traffic volumes on adjacent roadways.

#### Background Traffic Condition (Future No Build)

The study area was reviewed for future developments. The following approved developments were included as part of the 2024 background volumes:





Author:Dennis R. Roote, P.E. Subject:Rectangle Date:6/3/2021 6:42:33 PM

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This is not mitigation. There is no discussion about why these homes need to be acquired; what the land will be used for, when this will take place, or any other alternatives that may preserve Burnett Road. Furthermore, the DGEIS does not address all closing costs; relocation; or buyers cost for a new home. It is entirely unreasonable for people who are involuntarily displaced to shoulder such costs.

1. Chick-fil-A – a 5,000-square foot fast food restaurant building was approved to replace an existing 6,400-square foot Uno Pizzeria restaurant building located just west of the NYS Route 31 and NYS Route 481 southbound off ramp. Based on the hours of service for this facility, the PM peak hour trip generation was adjusted to reflect the restaurant closing. The existing pizza restaurant's PM peak hour trip generation was subtracted from the Chick-fil-A trip generation to reflect the total new trips.
2. Brewerton Road Development (8697 and 8699 Brewerton Road) – a 60-unit senior housing facility was approved and will be located on US Route 11 near Meltzer Court, a mile north of NYS Route 31.

The following background development was not included, in consultation with NYSDOT, because it is not yet approved:

3. Clay Marketplace – this site is anticipated to consist of 30,000 square feet of mixed-use development including apartments, retail markets, restaurants, and offices. The site is located on a 14.9-acre parcel near the intersection of NYS Route 31 and Henry Clay Boulevard. It will be a 96-unit apartment complex with 176 parking spaces and 60 garage spaces, 30,000 SF of commercial space, and access from 3 driveways. This site is anticipated to include roadway addition of turn lanes for the northbound (NB) and southbound (SB) approaches on Henry Clay Boulevard which were not assumed to be included.

#### 4.3.1 Trip Generation

The proposed expansion of the Park and potential development scenario as described in Section 1.1.5 of the Draft SGEIS will add trips to the transportation network. The development discussed within the Draft SGEIS is focused on developing the Park for potential industrial and commercial developers with a focus on a tenant or tenants in the semiconductor industry. The trips can be estimated from known site assumptions and from using the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition. The known site data description follows Land Use Code 140: Manufacturing. Trip generation rates used the average rate approach and Land Use Code 140 as described below.

##### *ITE Trip Generation Code - 140 Manufacturing*

A manufacturing facility is an area where the primary activity is the conversion of raw materials or parts into finished products. Size and type of activity may vary substantially from one facility to another. In addition to the actual production of goods, manufacturing facilities generally also have office, warehouse, research, and associated functions. Based on these factors, the total estimated trips were determined to be 493 trips in the AM peak hour and 440 trips in the PM peak hour. See Table 4.3-1 for more information.





Table 4.3-1: Trip Generation						
	Morning Peak Hour			Evening Peak Hour		
	In	Out	Total	In	Out	Total
Shift Entering	365	128	493	268	172	440
Shift Leaving	128	365	493	172	268	440
TOTAL	493	493	986	440	440	880

New trips from approved developments in the vicinity of the Park were also generated and distributed and are shown in Traffic Impact Study in Appendix B.

Following the NYSDOT HDM, it is assumed that construction traffic would be scheduled outside peak travel times where feasible and would determine detour routes around the proposed work zone. Therefore, additional analysis for construction traffic is not merited. Additionally, the I-81 Viaduct Project in Syracuse is still under review, but that project is not anticipated to affect this analysis. For more information on that project see <https://www.dot.ny.gov/i81opportunities>.

The analysis of other forms of transportation including, but not limited to, bus transit, ride share or carpool, that could impact single vehicle trips is not part of this study.

#### 4.3.2 Trip Distribution

To help support the change to the transportation area the use of future travel demand models was also used. The model is the first step to understand the shift in vehicle trips across the network based on future land use maps and other data. The Syracuse Metropolitan Transportation Council (SMTTC) provided from their travel demand model a select link analysis based on the site development for the particular Traffic Analysis Zone (TAZ).

**Note:** Additional information is provided in the Traffic Impact Study in Appendix B.

#### 4.3.3 Capacity Analyses

The purpose of conducting capacity analysis is to understand operations along the corridor, how a proposed development will impact those operations and determine the level of improvement needed to mitigate degradation in operations to the background condition. Capacity analysis was conducted for the following five scenarios:

1. Year 2021 Existing
2. Year 2024 Background
3. Year 2024 Background with Development
4. Year 2024 Background with Development and Build Improvements
5. Year 2044 Background with Development with 2024 Build Improvements



Intersection and arterial Level of Service (LOS) was determined for each scenario. The Level of Service calculation procedures are provided in the Highway Capacity Manual 6th edition (HCM) published by the Transportation Research Board, 2016. Synchro 11, developed by Trafficware, was utilized to determine the HCM LOS for the study intersections and arterial roadway, determine operational deficiencies and aid in determining appropriate mitigation. SimTraffic traffic simulation software was used to determine queue lengths.

The HCM quantifies the quality of traffic flow in terms of levels of service (LOS). See Table 3 (In Appendix B) for the six levels of service, with LOS A indicating very low levels of delays and LOS F indicating high levels of delays associated with congestion. These represent a qualitative measure of operational conditions within a traffic stream, and the perception of conditions by motorists and/or passengers. LOS and capacity for signalized intersections are calculated for each lane group (a lane group may be one or more movements), each intersection approach, and the entire intersection. The intersection LOS is merely a weighted average of the individual approaches and may not be considered a valid measure of the quality or acceptability of an intersection design since it can conceal poor operating conditions on individual approaches.

LOS at unsignalized intersections are only calculated for minor movements since the through movement on the major street is not affected by intersection traffic control.

### ***Year 2021 Existing Condition***

This section describes operations during the Year 2021 Existing and Year 2024 Background conditions. Existing conditions represents operations throughout the study area presently. The Year 2024 Background condition includes regional traffic growth and trips from approved developments.

During the 2021 Existing Conditions, the capacity analysis results for the AM and PM peak hour show most signalized intersections will operate at LOS D or better and all movements are to operate at LOS D or better except:

- NYS Route 31/I-81 southbound ramp left turn movement operates at LOS E for PM peak hours
- NYS Route 31/I-81 northbound off ramp right turn movement operates at LOS E for PM peak hours
- NYS Route 31/Lakeshore Road southbound right operates at LOS F for AM and PM peak hours

**Note:** Additional LOS and Delay information is provided in the Traffic Impact Study in Appendix B.

### ***Year 2024 Background Condition***

By the year 2024 background condition, the capacity analysis results for the AM and PM peak hour show most signalized intersections will continue to operate at LOS D or better, and all movements are to operate at LOS D or better except:

- NYS Route 31/I-81 southbound off ramp left turn movement operates at LOS E for PM peak hours
- NYS Route 31/I-81 northbound off ramp right turn movement operates at LOS E for PM peak hours



- NYS Route 31/ Lakeshore Road southbound right operates at LOS F for AM and PM peak hours

***Year 2024 Background Development and Background Development Build Conditions***

This section describes operations during the Year 2024 Background Development, the Year 2024 Background Development Build, and the Year 2044 Background Development Build conditions.

During the 2024 Background Development, the addition of development traffic causes slight delay increases at most intersections. The two Project site entrances are both expected to operate at LOS A. There are three intersections that degrade in LOS:

- NYS Route 31/Henry Clay Boulevard intersection reduces from LOS B to LOS C in AM peak hour and LOS C to LOS D in PM peak hour
- NYS Route 31/I-81 southbound intersection reduces from LOS C to LOS D in AM peak hour
- NYS Route 31/I-81 northbound off ramp intersection from LOS D to LOS F in PM peak hour

All movements are expected to operate at LOS D or better except:

- NYS Route 31/Henry Clay Boulevard – the northbound approach operates at E for AM peak hour
- NYS Route 31/US Route 11 – the southbound left operates at LOS E for PM peak hour
- NYS Route 31/I-81 southbound off ramp intersection – the southbound left operates at LOS E for AM and PM peak hours; the eastbound thru movement operates at LOS F for AM peak hour; and westbound left operates at LOS E for PM peak hour
- NYS Route 31/I-81 northbound off ramp – the eastbound left movement operates at LOS F for PM peak hour and northbound right turn movement operates at LOS E for PM peak hour
- NYS Route 31/Lakeshore Road – the southbound right operates at LOS F for AM and PM peak hours

NYSDOT is considering various options for Lakeshore Road improvements as outlined in the Traffic Impact Study in Appendix B.

The 2024 Background Development Build includes build improvements which address traffic delays for most intersections. These improvements are targeted to address movements that are LOS D or lower, as described above, and are further detailed in the Traffic Impact Study in Appendix B.

***Year 2044 Background Development Build***

The 2044 Background Development Build provides an outlook of how well the network operates in the future and holds up over time and includes the build improvements, which were developed to address traffic delay for most intersections.

The Year 2044 scenario is performed per HDM Exhibit 5-1b, which is for project work type that includes intersection reconstruction. The analysis requires an estimated time of completion (ETC) plus twenty years (or ETC+20). This scenario serves as an evaluation of how well improvements operate over time to Year 2044.

There are four intersections that degrade in LOS Year 2044 scenario compared to the 2024 Background Development Build condition:



- NYS Route 31/NYS Route 481 northbound intersection reduces from LOS C to LOS D in PM peak hour
- NYS Route 31/Morgan Road intersection reduces from LOS C to LOS D in PM peak hour
- NYS Route 31/US Route 11 intersection reduces from LOS C to LOS D in PM peak hour
- NYS Route 31/I-81 southbound intersection reduces from LOS B to LOS C in AM peak hour

#### 4.3.4 Traffic Mitigation

Identifying deficiencies that exist prior to the build condition and identifying those that are from the development are different. However, applying capacity improvement measures is required for the proposed build condition to meet minimum LOS conditions. These mitigation improvements start with selecting the most cost-effective improvements. These NYSDOT improvements can include:

- Retiming traffic signals or adjusting signal phasing
- Signage or striping to prevent turning movements at intersections
- Addition of turn lanes to increase capacity
- Installation of traffic signals
- Conversion of a signalized or unsignalized intersection to a roundabout

Proposed mitigation measures were developed to improve operations to 2024 Background levels and meet acceptable LOS D or better operations. The aforementioned operational deficiencies during the AM and PM peak hour, along with a summary of the improvements, are provided in the Traffic Impact Study in Appendix B.

Capacity analysis was conducted with the proposed mitigation improvements and results are provided in the Traffic Impact Study in Appendix B. Queue results and speed results are provided in the Traffic Impact Study in Appendix B. Results of the capacity analysis show movements will operate better compared to 2024 Background levels and meet acceptable LOS D or better. These improvements will provide better operations through the year 2044. Queueing deficiencies will be mitigated, especially the extensive queues at the I-81 interchange. Furthermore, speeds will improve along the east side of the study area with the proposed improvements.

Capacity analysis was performed, and the following capacity improvement measures are recommended to address LOS, travel speeds, delay, and safety:

- NYS Route 31 at Henry Clay Boulevard – construct a northbound left turn lane.
- NYS Route 31 at US Route 11 – construct an additional left turn lane to provide for westbound dual left turn lanes and modify left-turn phasing from permissive/protected to protected.
- NYS Route 31 at I-81 Southbound Ramps – construct an additional left turn lane to provide westbound double left turn lanes, change westbound left turn phasing from permissive/protected to protected, and widen to two lanes on the on-ramp before merging to a single lane prior to the merge on to I-81.
- NYS Route 31 at I-81 Northbound/Pardee Road – construct an additional left and right turn lane on the I-81 northbound off ramp.



- NYS Route 31 at Site Entrance 2 – add a left turn lane along NYS Route 31 eastbound and a right turn lane along NYS Route 31 at the site entrance. A left and right turn will be provided out of the site. A traffic signal is recommended at the intersection.
- Caughdenoy Road at Site Entrance 1 – provide a right and left turn lane from the site entrance and along Caughdenoy Road.
- NYS Route 31 at Lakeshore Road – (concepts have been developed and coordination will take place with NYSDOT for future consideration.)

Circulation to the site is projected and modeled based upon Section 4.0 in the TIS in Appendix B. If changes occur to how the Park is accessed and volumes increase on Caughdenoy Road beyond those currently projected and modeled, then further mitigation would be recommended to construct an eastbound left turn lane along NYS Route 31 to help with through movement from being delayed by turning vehicles.

A crash analysis was performed for three locations from the 2017-2019 HAL list. Between May 1, 2015 and April 31, 2018, there were 462 total crashes at the three study area segments. The proposed recommendations include mitigation measures at each of these locations based on a review of capacity analysis and collision type.

Overall, the transportation network with Development and Build improvements will operate better than existing conditions. With the proposed recommendations, the study area will maintain an acceptable Level of Service of D or better in design year 2024.

As the level of service analysis shows, there are intersections and movements that are projected to fail by 2044. The main areas of concern are at the NYS Route 481 interchange and NYS Route 31 between US Route 11 and the Interstate 81 ramps. These areas are projected to be failing or near failing by 2044. Any improvements beyond 2024 need to be reviewed for mitigation at a later time.

## **4.4 Utilities & Community Services**

Updated estimates of the potential demands for electric, gas and water supplies, and estimates of sanitary waste volumes have been developed based on the types of industry OCIDA is seeking to attract to the proposed expanded Park:

- Power – up to 500 megavolt-amperes (MVA)
- Water – 5 million gallons per day (MGD)
- Wastewater – 4 MGD
- Natural Gas – up to 7000 meters cubed per hour (m<sup>3</sup>/hr)

OCIDA anticipates that these capacities are adequate to accommodate high technology industries including, but not limited to, semiconductor manufacturing.



#### 4.4.1 Utilities Impacts

##### *Electric, Fiber Optic and Phone Service*

The existing National Grid Clay Substation along Caughdenoy Road is a major hub for high-voltage bulk power transmission. Correspondence from National Grid (March 18, 2021, see Appendix C) indicated the existing transmission infrastructure can presently provide up to 540 MVA to the Park, and up to 1,200 MVA is possible in the long term. The estimated Project demand of 500 MVA is within the levels that National Grid has indicated can be provided, and therefore the potential development of the expanded Park would not adversely impact local supplies or capacity. No mitigation would be required.

##### *Natural Gas*

The March 18, 2021 correspondence from National Grid indicated that with the extension of the gas main from Gas Regulator Station #147 to the Project site, up to 750 dekatherms per hour (dth/hr) can presently be provided to the Project site with projected future availability of 1,000 dth/hr. The estimated demand of 7,000 m<sup>3</sup>/hr, equivalent to 245 dth/hr, is within the levels that National Grid has indicated can be provided, and therefore the potential development of the expanded Park would not impact local supplies or capacity. No mitigation would be required.

Two routes have been considered to connect the Park to the Gas Regulator Station. These are referred to as the proposed route and the alternative route (see Figure 3.4-1). The location of the proposed route lies within previously disturbed public and utility rights-of-way over much of the length of the proposed route. The first 4,500 feet of the route lies along NYS Route 31. The route then follows an existing power line right-of-way north parallel to Shaver Creek and east, crossing Van Hoesen Road, continuing east to the point where the power line enters the Clay Substation. The route then extends around the south end of the substation, crossing the CSX rail line and Caughdenoy Road into the Park property. Access for construction of the segment of the line lying in the existing transmission line easement will be primarily from NYS Route 31 and Van Hoesen Road. The segment of the line between the transmission line and the Park will be from existing access roads for the National Grid Clay Substation and Caughdenoy Road. Temporary construction easements will be necessary along the proposed route. Permanent easements will also be necessary for those areas outside the NYS Route 31 right-of-way. Such temporary and permanent easements will be acquired by negotiated purchase or pursuant to the EDPL as necessary.

The alternative route makes use of public rights-of-way for the entire length of the route. The alternative route extends from the Gas Regulator Station east along Route 31 to the intersection of Henry Clay Boulevard, turns north following Henry Clay Boulevard to the intersection of Verplank Road, then east along Verplank Road to the intersection of Caughdenoy Road, then south to the point South of the National Grid substation where the proposed route crosses Caughdenoy Road, then east into the Park on the same path as the proposed route. This route is previously disturbed as it follows public roads for the entire length. Easements may be required along the route. Temporary construction easements will be necessary along the proposed route. Such temporary construction easements will be acquired by negotiated purchase or pursuant to the EDPL as necessary.

Installation of new gas mains will involve temporary construction impacts along the route. The impacts may include ambient noise, soil disturbance, and interruption of traffic at construction access points.





These temporary impacts will be mitigated through proper construction and best management practices. Trenching, boring and horizontal directional drilling will be utilized to minimize disruption of traffic during construction and to minimize impacts to any wetlands that may be delineated along the route of the proposed gas line. Best management construction practices will be used, including, soil and erosion control and stormwater management. Disturbed areas will be re-graded and reseeded to pre-construction conditions. Since the proposed route is shorter than the alternative route, construction along the proposed route would result in fewer impacts and it is therefore preferred as the proposed route over the alternative route.

### ***Sanitary Sewer***

According to April 29, 2021 correspondence from OCWEP, the capacity for up to 4.0 MGD is currently available at the Oak Orchard WWTP. The estimated sanitary sewer discharges from potential development of the expanded Park of 2.4 MGD to 4.0 MGD are within the levels that OCWEP has indicated they can accommodate. The potential development, therefore, would not adversely impact the capacity of the WWTP to handle sanitary flows from the remainder of the service area. No mitigation is required. Further OCWEP had previously commenced the design of the conveyance infrastructure to serve lands within the surrounding district and future development areas. OCWEP estimates that conveyance infrastructure will be available within 24 months.

Industrial wastewater pre-treatment may be required on-site by the OCWEP prior to discharge to the Oak Orchard WWTP, if the wastewater strength from the expanded Park exceeds the limits established for discharge to the municipal sanitary sewer system. It is expected that future operations will include one or more wastewater treatment facilities that will provide pretreatment of wastewater prior to discharge into local sewers. Typical pretreatment methods include pH adjustment, flocculation, filtration and settling of solids. Wastewater sludge, which will be produced as a byproduct, will require offsite disposal. Discharge of the wastewater itself into the sewer system would be done in accordance with a permit from the Onondaga County Department of Water Environment Protection (OCWEP). The permit will establish effluent discharge limits and regular monitoring to verify permit compliance. Pre-treatment would be coordinated with OCWEP and the responsibility of the Park tenant(s).

The conveyance infrastructure to support lands without the surrounding district including the Park is six-inch and 12-inch diameter PVC force mains along Caughdenoy Road for about 1,000 feet, then heading west along the existing 99-foot wide Metropolitan Water Board easement that parallels NYS Route 31, and then north within the County's easement that contains the Davis Road Force Main and the Clay – Cicero Force Main to the Oak Orchard WWTP. Installation of new sewer lines will require temporary construction from existing rights-of-way in the area. These temporary impacts will be mitigated through proper construction and best management practices.

Since the majority of the proposed sewer route follows existing MWB and OCWEP easements, the need to procure permanent easements along this route is practically non-existent. However, temporary construction easements required for the installation of bored crossings may be required and to the extent permanent easements are required they will be acquired by OCWEP by negotiated purchase or pursuant to the EDPL. The use of borings under roads and the CSX rail line will minimize disruption of traffic and the need for reconstruction and resurfacing of roadways. Temporary traffic detours may be needed at road crossings.



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Trenching will be used through upland areas along the MWB and OCWEP rights-of-way. Most upland areas along the rights-of-way are active cropland or vacant farm fields consisting of shrubs. Best management construction practices will be used in these areas including soil and erosion control and stormwater management. Disturbed areas will be re-graded and reseeded to pre-construction conditions.

Wetland mapping shows that federal and state wetlands are potentially present in certain parts of the proposed routes of the utility improvements. Should field surveys verify regulated wetlands are present during the course of preparation for utility line construction, the proposed force mains and gas line will be installed through wetland areas using horizontal directional drilling (HDD) methods to avoid adverse impacts.

### ***Water***

Public water service is available from adjacent water lines to the Park. According to correspondence from OCWA (March 19, 2021, see Appendix C) indicates that 3,700 gpm at 20-psi is available for the Park. OCWA indicates the current availability for the Park is 1 MGD. OCWA has plans in place that would allow a supply of 5 MGD within 180 days, and potential to provide 11 MGD at an 18 month to two-year horizon. The expanded Park's estimated water demand of 5 MGD is within the levels OCWA has indicated it can provide, and therefore future development of the Park would not adversely impact the availability or capacity of the local public water supply in the surrounding area. No mitigation would be required.

## **4.4.2 Community Services and Resources Impacts**

### ***Police, Fire, and Emergency Services***

Future tenants of the Park are expected to provide security and basic emergency preparedness programs for their own facilities. New York State and federal regulatory agencies, such as the EPA, have specific requirements for managing hazardous materials which may be stored on site. Tenants will be required to adhere to all such regulatory requirements. As appropriate based on their industry, tenants of the Park will be expected to have emergency response plans that outline procedures to be undertaken to deal with fire, spills, injuries, etc. These procedures will include specialized training including clean-up and coordination with emergency responders from the community. In accordance with State and Federal regulations, emergency response plans will be reviewed by local officials to ensure that public service providers are properly prepared and equipped in the event they are needed to support tenant security personnel.

Tenants are expected to provide on-site water storage for fire suppression and emergency operations. The specifications for fire suppression systems are stipulated in national building and fire codes. The plans for fire suppression and control systems are reviewed and approved by local emergency officials.

With the noted life safety, security and emergency response provisions required of future Park tenants, development of the expanded Park is not anticipated to create a burden on the provision of police, fire, and emergency services. No mitigation is required at this time.



### *Parks and Recreation Facilities*

Development of the Park will not result in the loss of public open space. The extensive regional opportunities for outdoor recreation will easily accommodate the potential increase in population that is brought to the area by employment opportunities in the Park. Potential development of the expanded Park is not anticipated to create adverse impacts on community parks and/or recreation facilities. No mitigation is required.

### *Schools*

In 2019, there were 255,844 households in the Syracuse Metropolitan Statistical Area (according to the US Census Bureau American Community Survey, 1-year estimates, 2019) which includes the counties of Onondaga, Oswego and Madison. It is assumed that the future development of the Park as considered for this Draft SGEIS could create up to 4,000 new jobs, many of which could be filled by people not currently living within the Syracuse Metropolitan Area. These new jobs could bring up to 4,000 new households to the area. Assuming that the increase in the student population would be proportional to the increase in the number of households and that the households are evenly distributed throughout the Syracuse MSA, the North Syracuse Central School District enrollment would be expected to increase approximately 1.6% (136 additional students to the current district student population of 8,500 pupils). It should also be noted that the Syracuse MSA population declined between 2010 and 2019 by approximately 2% (662,757 in 2010 to 648,593 in 2019, US Census Bureau), which means the projected increase resulting from the Project would potentially backfill the decline in the student population.

An increase of approximately 136 students is not anticipated to place an undue burden on local schools and educational facilities. The development of the Park is not anticipated to create adverse impacts on local schools and educational services. No mitigation is required.

### *Other Community Services*

OCIDA intends to acquire the property on which the Upstate New York District Church of the Nazarene is located by negotiated purchase or pursuant to the EDPL and other applicable law. The parcel will become part of the Park and the building will be removed, requiring the Nazarene District office to be relocated. Any community services provided by the church at this location (e.g., counseling, meeting space, day care programs, and clothing and food distribution, etc.) would be curtailed by development of the Park.

## **4.5 Topography, Geology & Soils**

### **4.5.1 Topography**

#### *Impacts*

Any potential impacts to topography of the proposed expanded Park would be relatively minor and are consistent with the finding of 2013 FGEIS.

Construction of a new gas line, and activities associated with demolition of existing structures will potentially cause negligible to minor impacts on topography. The utility right-of-way (ROW) will require





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some grading during installation. Subsurface materials will be removed along the new utility trench. The trench will be backfilled with excavated material once the new gas line is installed. The soil will be replaced in lifts, compacted, and crowned slightly to accommodate any settling. This could result in minor localized changes to grade; however, slopes will be blended with the surrounding topography and overall impacts will be negligible to minor. Additionally, much of new utility route will likely be within existing ROWs, where construction has already modified the natural topography.

### ***Mitigation***

Mitigation for topography was detailed in the 2013 FGEIS (Draft Section 4.5.1). No additional mitigation for on-site topographic changes is necessary.

Off-site underground utilities will be installed in shallow trenches that will be backfilled to original grade. If any high or low points are traversed and disturbed, special care will be given to minimize the degree and extent of such disturbance. The ground in the disturbed areas will be stabilized and returned to its original condition shortly after utility installation. Where it is not practicable to restore the ground to its original topographic condition, care will be taken to blend the ground together and stabilize the surface. It is also anticipated that there will be prompt site restoration back to original conditions or as closely thereto as is practicable, with little to no long-term change in topographic conditions.

## **4.5.2 Geology**

### ***Impacts***

Site development will not affect any geologic resources since there are no unique geologic features at the expanded Park or in the immediate vicinity. Furthermore, the Project site does not contain any significant mineral resources. Unconsolidated deposits are primarily silt and fine sand, which are not typically highly valued. These materials are commonly available throughout the region. Subsurface bedrock deposits consist of shale and dolostone. These rock types are not unique and occur across extensive areas in central and western New York. Future site development will not significantly reduce the availability of these building materials.

Shallow bedrock is present in some portions of the Project site. The need for potential blasting during construction and development of a blasting plan were discussed in the 2013 FGEIS. No additional mitigation beyond the measures previously proposed are necessary.

The majority of the construction route for the off-site utilities occurs within existing ROWs. In these areas, the ground was previously modified by clearing, grubbing, excavation, and backfilling activities. As such, very little undisturbed ground remains within existing ROWs and no significant, long-term environmental impact to geology will occur. Where the new utility route traverses' ground that has seen limited previous disturbance, the nature of the construction methodology will cause only minor, temporary disturbances. During utility installation, there could be localized impacts (ground vibrations, noise) if blasting is necessary. This would be limited to areas that encounter rock that could not be removed by conventional excavation methods.



### ***Mitigation***

Mitigation for geology was detailed in the 2013 FGEIS (Draft Section 4.5.2). No additional mitigation for on-site geologic related items is necessary.

Geologic materials will be disturbed during off-site utility trench excavations. To the extent possible, trench backfill will be derived from the original excavated material. Depending upon the subsurface conditions, the new utility trench could be constructed using various technologies including standard excavation, mechanical hammer, or shallow blasting. Where shallow rock is encountered, as much as possible will be crushed and returned to the trench as backfill. Depending upon the nature of the material, shallow bedrock will be removed with a backhoe, controlled blasting, or a mechanical hydra-hammer. Blasting will only be conducted by licensed and trained professionals. Unconsolidated soils removed to construct the trenches will be screened as necessary and returned to the excavated trench for backfill. Any excess earth or rock that was removed during the excavation process will either be graded within the ROW at designated and approved locations or transported off-site for disposal.

### **4.5.3 Soils**

#### ***Impacts***

Soil conditions for the expanded Project site are generally similar to those that were evaluated in the 2013 FGEIS.

About 39.4% of the soils at the expanded Project site are favorable (with only moderate limitations) for agricultural use. In addition, nearly 78% of the soils are comprised of soil groups 1-4, which are mineral groups with potentially favorable agricultural properties. Although the property currently has only limited agricultural use, future development as a business park/manufacturing site will reduce the availability of suitable agricultural soils. This will result in a small, unavoidable impact.

Bringing a new utility service to the Project site will involve temporarily disturbing soils along a linear distance. Much of the utilities will be constructed within an existing ROW corridor. Because the soils along existing ROW have been previously disturbed/impacted, potential development will have negligible to minor impacts to soils in those areas. In locations where the soils have not been previously disturbed, potential impacts will be localized, minor, and short-term. Best management practices and engineering controls will mitigate potential impacts.

#### ***Mitigation***

Mitigation for soils was detailed in the 2013 FGEIS (Draft Section 4.5.3). No additional mitigation for on-site soil disturbance is necessary.

Prior to beginning the offsite utility trench construction, a future developer will obtain a NYSDEC SPDES permit for construction. This permit will require that erosion control measures be established to mitigate any potential impacts. Erosion controls such as silt fencing, hay bales, erosion logs, rip rap, and use of temporary drainage controls (e.g., waterbars, slope breakers, culverts) will be established. In general, topsoil will be stripped and stockpiled, and will be used after construction to re-establish the original surface condition to the greatest extent practicable. The disturbed soil will be restored and



stabilized by grading, seeding, and planting of native species matching or consistent with the surrounding terrain and vegetation. Excess soils will be disposed of at established on-site locations or transported to approved off-site disposal sites. Soils that are excessively compacted due to heavy equipment, will be roto-tilled or aerated prior to re-seeding. Restored areas will be monitored to ensure that revegetation was effective and that there is no ongoing soil erosion. If necessary, periodic re-seeding will be performed.

## 4.6 Water Resources

### 4.6.1 Groundwater

#### *Impacts*

No adverse environmental conditions were noted during the previously prepared geotechnical investigation. That study included analysis of certain areas within the expanded Park. There is currently no known usage of groundwater in the expansion area. It is expected that on site groundwater will not be used as a water source, since a nearby OCWA water main can serve the Park.

Construction and operational activities at the Park are not expected to have any significant impact to either groundwater quantity or quality. Potable water at the Park will be derived from an existing OCWA waterline and groundwater will not be needed. Therefore, site operations will have no impact to long-term groundwater quantity.

Shallow groundwater conditions will need to be considered during site design/construction and may require engineering controls or mitigation, as was indicated in the prior 2013 FGEIS.

Potential development at the expanded Park could create up to 4,000 jobs, which could increase demand for housing, and require new residential construction spread throughout the Syracuse Metropolitan Statistical Area for future employees. Additional drinking water supplies, some of which may be from groundwater sources, are likely. This could present a relatively small, localized impact on groundwater availability.

Potential groundwater impacts associated with the proposed utility lines have been evaluated by identifying and assessing the existence of mapped sand and gravel aquifers within the vicinity of the proposed gas and sewer line routes. Both proposed utility routes are located within unconsolidated, confined aquifers, located in the immediate vicinity of Mud Creek. However, no significant impacts to these resources are anticipated, as construction of the proposed utility lines are not expected to encounter groundwater and general best management practices will be followed to avoid and/or minimize any potential impacts to groundwater quality as described below.

#### *Minimization and Mitigation*

Prior to beginning construction of off-site utility trenches, a Stormwater Pollution Prevention Plan (SWPPP) and SPDES Construction Permit with provisions to address potential concerns associated with accidental spills or leaks from construction equipment will be prepared. Included will be controls for vehicle refueling, maintenance, equipment inspections, spill response, and storage of petroleum products.



No additional mitigation for on-site groundwater, beyond what was identified in the 2013 FGEIS (Draft Section 4.6.1) is necessary.

New off-site groundwater supplies may be necessary to support residential construction for the anticipated work force. Mitigation for off-site groundwater supplies is generally beyond the control of the future site developers and not quantifiable at this time. However, the impact is expected to be relatively minor. New housing would likely be built in multiple areas and builders would prefer areas with existing water supplies. If new water wells are drilled to support residential developments, they would require permits from NYSDEC, NYSDOH and the local health department. Wells for an individual home would require relatively minor amounts of groundwater, typically 5 gallons per minute or less. With appropriate well spacing, this amount of pumping will not significantly impact groundwater resources.

#### **4.6.2 Surface Water**

##### ***Impacts***

As detailed in the 2013 FGEIS, significant permanent impacts to surface drainage and surface water quality are not expected as on-site development activities will avoid surface water features to the greatest extent possible. Because surface water drainage is primarily influenced by slope and soil properties, and these two factors will be largely unchanged from the original conditions following site development, no significant impacts to surface water are expected.

No significant impacts are anticipated along the proposed utility routes because the excavated trench work will be backfilled primarily with the originally excavated soils, and the topography will be restored to the initial grade. There may be minor, temporary impacts to surface water drainage and quality during the construction of the on-site facilities and the installation of the proposed utility lines. These temporary potential impacts could result from ground disturbances that cause a localized increase in turbidity, changes in slope, loss of vegetation and minor leaks or spills of fluids from construction equipment, or inadvertent loss of poured concrete.

##### ***Minimization and Mitigation***

In areas where surface water is encountered by the utility installations, temporary diversion structures would be utilized to control surface water flow and bypass the work zone. Such temporary measures may include: the use of small coffer dams, bypass piping, culverts, temporary drainage ditches, or trench boxes. Excavated soils would be protected or staged in a manner that prevents runoff and increased turbidity into adjacent streams. The location and extent of any temporary or permanent measures will be determined at the engineering design phase of tenant development. Implementation of these measures may require authorization under a United States Army Corp of Engineers (USACE) Nationwide Permit, which would likely be determined during and/or after the engineering design phase. Any other local, state, and/or federal regulatory requirements would also be determined at that time.

No additional mitigation for onsite surface waters, beyond what was identified in the 2013 FGEIS (Draft Section 4.6.2) is necessary.



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The acreage of planned or estimated impervious are needs to be stated.

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This statement is misleading. Surficial permeability (soil/ground cover, pavement, or other improvements such as roofs and and landscaped/hardscaped areas) is the predominant factor. Slope determines velocity with determines flow (Volume/Time).



#### **4.6.3 Stormwater/Drainage/Flooding**

##### ***Impacts***

During facility construction, standard best engineering practices will be employed to minimize any changes to existing topography and vegetative cover. These general procedures will minimize any related impacts to existing surface drainage and water quality. Impacts to drainage patterns on site will be avoided by incorporating permanent stormwater controls to maintain peak storm discharges at or below pre-development levels.

A 100-year floodplain and associated floodway exists alongside Mud Creek, along the preferred sewer line route. This includes an approximate 800 feet section of the existing sewer route, north of NYS Route 31. It is anticipated that this floodplain will not be adversely affected by utility line construction. Normal operation of the utility line will have no impact on the floodplain since topographic changes will be minimal. Minor temporary impacts during construction could occur. These impacts could include erosion as well as sediment loading. Mitigation measures are discussed below.

##### ***Minimization and Mitigation***

As detailed in the 2013 FGEIS, it is anticipated that coverage under SPDES General Permit for Stormwater Discharges from Construction Activity, GP-0-20-001 (SPDES Construction GP) would be required, as construction activities associated with site development are anticipated to be greater than one acre. A Notice of Intent (NOI) would need to be filed with NYSDEC in advance of any construction activities or ground disturbance. As part of the SPDES Construction GP and SWPPP, a MS4 SWPPP Acceptance Form from the Town of Clay and/or Town of Cicero may be required, depending on the off-site locations of the stormwater discharges. The SWPPP would also identify best practices and standards for erosion and sediment control incorporating engineering standards developed by the NYSDEC (2016). The SWPPP would identify best practices and standards for erosion and sediment control incorporating engineering standards developed by the NYSDEC (2016). These practices may include engineering controls, such as silt fences, hay bales, geofabric installation, stormwater retention, stabilized construction entrances, check dams, and infiltration basins. A Spill Prevention Control and Countermeasures (SPCC) Plan and/or a NYSDEC Petroleum Bulk Storage (PBS) Registration may also be required if site development and/or operations are deemed regulated. The SPCC Plan would address the potential for minor accidental spills or leaks from construction equipment as well as any on-site PBS tanks or containers. The plan would also include provisions for inspections, secondary containment, equipment refueling practices, and spill response.

As there are no floodplains or Special Flood Hazard Areas on-site, no impacts to floodplains or Special Flood Hazard Areas would occur and therefore mitigation in these areas would not be required.

Final design should make provisions for avoiding impacts to the floodplain, such as locating above grade infrastructure outside of the floodplain and by maintaining grades within the proposed utility routes. Best management practices will be implemented during construction, including sediment and erosion control measures. It is not anticipated that any stream disturbance to Mud Creek would occur nor is it anticipated that any structures or other fill materials will be placed within the floodplain that would affect its function or value. Furthermore, previously disturbed locations will be selected for material storage/staging during



installation of the utilities to the greatest extent possible to minimize impacts. Areas of disturbance will be re-graded and re-seeded once the installation of the utilities are complete.

No additional mitigation for on-site stormwater, drainage, and flooding, beyond what was identified in the 2013 FGEIS (Draft Section 4.6.3) is necessary.

## 4.7 Air Resources

### 4.7.1 Air Quality

Air emissions resulting from potential development of the proposed expanded Park may be associated with mobile and stationary sources, including transportation vehicles and manufacturing processes, respectively. Potential sources of emissions may be related to manufacturing support systems, heating and cooling, storage tanks, wastewater treatment, and site utilities such as boilers, chillers and back-up generators. Semiconductor manufacturing makes use of processes that require specific chemicals, heat and clean water. The processes typical of the industry include:

- Photolithography
- Doping
- Thin Film Deposition/Layering
- Etching
- Cleaning
- Chemical Mechanical Planarization

Process heat is generated from natural gas boilers. To accommodate disruptions in the supply of natural gas, some boilers are designed to also burn #2 fuel oil. The boilers generate combustion products including CO, NO<sub>2</sub>, SO<sub>2</sub>, and PM/PM<sub>10</sub>/PM<sub>2.5</sub>, and through secondary chemical processes in the atmosphere combustion products produces ground level O<sub>3</sub>.

Although there is currently no known tenant(s) for the proposed expanded Park, it is anticipated that a tenant from the semiconductor industry could have the following combustion sources:

- Boilers firing natural gas with a maximum heat input rating of approximately 40 MMBtu/hr, each.
- Boilers firing natural gas, with #2 fuel oil during periods of natural gas curtailment, with a maximum heat input rating of approximately 40 MMBtu/hr, each.
- Miscellaneous natural gas fired sources with a maximum heat input rating of <10 MMBtu/hr.
- Emergency generators that fire diesel.
- Some exempt and trivial sources, including the wastewater pre-treatment operations.



Table 4.7-1 Representative Facility Emissions Summary <sup>1</sup>	
Contaminant Name	Potential to Emit (tons/year)
PM <sub>10</sub>	15-20
PM <sub>2.5</sub>	15-20
Sulfur Dioxide	15
Oxides of Nitrogen	99 (capped)
Carbon Monoxide	99 (capped)
Lead (elemental)	1.3E-03
Total Volatile Organic Compounds	13
Total Hazardous Air Pollutants	17
Carbon Dioxide Equivalents	251,000

<sup>1</sup>Due to the fact that there is no specific tenant for the Park, process specific operating data, including material usage, is unavailable. A representative emissions inventory for a generic semiconductor manufacturing operation was created as a basis for these estimates.

The chemical processes utilize specialty gases and volatile organic compounds. The chemical used in the largest quantity is typically ammonia. The chemical processes generate regulated contaminants which may include hazardous air pollutants. The main pollutants commonly associated with semiconductor manufacturing include but are not limited to ammonia, hydrogen chloride (HCl), hydrogen peroxide, and nitrogen trifluoride.

Exposure to ammonia and hydrogen peroxide may cause irritation of the eyes and respiratory tract. Acute exposure can cause burns and is potentially fatal. Exposure to irritating concentrations of HCl can result in coughing, pain, inflammation, edema, and desquamation in the upper respiratory tract. Acute exposure to high concentrations might produce constriction of the larynx and bronchi and closure of the glottis. Exposure to nitrogen trifluoride can cause dizziness and asphyxiation. Contact with liquid ethyl lactate may cause mild irritation of eyes and (on prolonged contact) skin. Breathing cyclopentanone can irritate the nose and throat causing coughing and wheezing. High exposure can cause dizziness, lightheadedness and passing out. ([www.epa.gov](http://www.epa.gov), [www.osha.gov](http://www.osha.gov); [pubchem.ncbi.nlm.nih.gov](http://pubchem.ncbi.nlm.nih.gov))

Mobile source air emissions will result from private employee vehicles and transportation of manufacturing materials, products and by-products by truck and rail. Air emissions from vehicle traffic will be related to vehicle exhaust from idling vehicles due to traffic movement and congestion. The emissions from mobile sources are essentially combustion products which have the potential health impacts described above. According to the FHWA interim guidance, a quantitative mobile source air toxics analysis should be considered for transportation projects located in proximity to populated areas that create new capacity or add significant capacity to urban roadways with projected annual average daily traffic (AADT) of at least



140,000 vehicles or create (or significantly alter) a major intermodal freight facility involving significant numbers of diesel vehicles. The proposed development does not trigger any of these requirements.

#### **4.7.2 Climate Change**

Based on the representative GHG emission estimates for a generic semiconductor manufacturing operation, GHG emissions from the expanded Park could include the following:

- Direct GHG emissions associated with natural gas and fuel oil combustion in boilers, thermal incinerators and other miscellaneous natural gas-fired sources
- Carbon dioxide emissions from the oxidation of volatile organic compounds (VOCs) from the expected use of liquid chemicals
- Specialty gases used in the manufacturing process, including fluorinated and chlorinated GHGs.
- Indirect (upstream) GHG emissions from the import of natural gas and fuel oil

Potential direct annual GHG emissions at the expanded Park could range from 150,000 metric tons carbon dioxide equivalent (MTCO<sub>2</sub>e) to 350,000 MTCO<sub>2</sub>e. Approximately 10-15% of these GHG emissions are expected to result from the use of specialty gases including nitrogen trifluoride and sulfur hexafluoride, which have 20-year global warming potentials (GWP) of 12,800 and 16,300, respectively. Indirect (upstream) potential annual GHG emissions from the import of fossil fuels could range from 150,000 MTCO<sub>2</sub>e to 250,000 MTCO<sub>2</sub>e.

#### ***Minimization and Mitigation***

As noted in the 2013 FGEIS, all future industrial development will be subject to applicable air emission permitting under NYSDEC. Such an application will be required to be submitted to NYSDEC who will, in turn, review the application in accordance with all applicable state and federal laws, and impose appropriate permit conditions. NYSDEC will also undertake a review of the potential development's GHG emissions under the CLCPA.

The waste products generated in the largest quantity are typically hydrofluoric and hydrochloric acid. Emissions of hydrofluoric and hydrochloric acid and other chemical pollutants associated with semiconductor manufacturing are controlled with acid gas scrubbers and caustic gas scrubbers. These devices reduce emissions by capturing and converting the contaminants to liquids that can then be treated or disposed of. Volatile organic compounds are controlled with thermal oxidizers which decomposes hazardous gases at high temperatures by burning natural gas. Equipment controlling emissions must be operated and maintained in accordance with the monitoring requirements of any future air permit.

Facilities locating within the Park will have to meet air emission permit requirements designed to meet the NAAQS and comply with all applicable regulatory requirements. NYSDEC will impose, as appropriate, permit conditions to implement emission control equipment and other operating parameter and conditions, which any prospective tenant will be required to abide by. In addition to the permitting requirements, mitigation for air pollutant emissions include material handling protocols and industrial good housekeeping practices.



For purposes of minimizing GHG emissions, future tenants will be encouraged to promote green infrastructure and energy efficiency (Section 9.0) and, to the extent feasible, use renewable forms of energy to power operations. In general, Park tenants will be expected to take a proactive approach to addressing sustainability, climate change and GHG reduction. Depending on the specifics of future development of the Park, this approach may include the following:

- Working to develop process improvements, including those that reduce GHG emissions by eliminating the use of the GHGs with higher GWPs.
- Setting goals to improve energy efficiency and reduce electricity consumption.
- Use of a vehicle fleet that includes hybrid and electric vehicles.

The boilers, incinerator and diesel generators that will be operated at the facility will be new. For the purpose of promoting efficient operation and reducing the potential for excess GHG emissions, these sources will be operated in accordance with the manufacturer's instructions. Boiler maintenance and testing will also be conducted in accordance with the manufacturer's instructions. Dual-fired boilers will be operated such that fuel oil will be used as backup and only when natural gas is not available.

Some specialty gases that will be used in processes at the facility will have built-in point of use (POU) abatement devices which are integral to the processes. The POU abatement expected to be utilized at the facility consist of thermal-based incineration followed by a water scrubber. The halogenated specialty gases, including fluorinated and chlorinated GHGs, will decompose into HF and HCl which is then absorbed by the water side of the POU. The HF and HCl that is not captured by the water side of the POU is then sent to the house scrubbers for control.

With respect to mobile emissions, road and intersection improvements adjacent to the Project site as determined by the traffic analysis will provide for smoother traffic flow and reduced delays along access roads to the Park. Movement of goods and materials for use by rail could help reduce the amount of truck traffic to and from the Project site. Combined these efforts are expected to generally reduce air emissions associated with potential future development of the Park, including GHG emissions.

Construction-related air quality impacts will be temporary, and mitigation will be implemented to control fugitive dust problems by sweeping and wetting down road surfaces and laydown areas used by haul vehicles. In addition, existing vegetative buffer areas will be maintained to the greatest extent practicable on-site to reduce wind-blown dust. Maintaining vegetated buffer areas and re-vegetating disturbed areas as soon as practicable along the periphery of the Park and internally alongside wetlands and other surface features will help control stormwater runoff and fugitive dust from moving off-site.

Erosion and sediment control practices will be implemented on-site and along utility routes being utilized for the installation of utilities. A summary of practices that will implemented are available from the NYSDEC [http://www.dec.ny.gov/docs/water\\_pdf/bluebkllite.pdf](http://www.dec.ny.gov/docs/water_pdf/bluebkllite.pdf) . These will include a combination of practices to control sediment and dust.

#### 4.7.3 Odor

Odors can result from emission of organic and inorganic compounds. Different compounds produce different odors and have unique detection and recognition thresholds. As indicated in the air permit



application, emissions of hydrogen chloride and ammonia are expected to be among the larger emissions from manufacturing facilities likely to be located in the Park. The permit application indicates estimated actual annual emissions of hydrogen chloride and ammonia each of approximately 20,000 pounds per year. The odor detection threshold for hydrogen chloride is variously listed between one and five parts per million ([www.chlorineinstitute.org](http://www.chlorineinstitute.org)), and as low as 0.25 ppm (NIH PubChem database). The odor detection threshold for ammonia is 5 ppm according to several sources (OSHA, CDC). Odor detection thresholds for other compounds included in the permit application emissions vary by compound. Without proper mitigation, the potential exists for odors to occur. As noted in the discussion of air impacts and mitigation, facilities manufacturing semiconductors utilize a variety of controls to reduce the concentration of pollutant emissions.

## 4.8 Ecological Resources

### 4.8.1 Wetlands

The goal for potential development at the Park has been and continues to be the avoidance of adverse impacts to wetlands to the maximum extent practicable and development of the Park will adhere to a practice of avoidance, minimization, and if necessary, mitigation of impacts to wetlands.

It is anticipated that much of the development at the expanded Park will occur in the prime developable area of approximately 732 acres which does not include any mapped wetlands. As described in Chapter 3, Section 3.8 most of the potential NWI and NYSDEC-mapped wetlands (limited to those that are 12.4 acres or larger) are situated on the eastern perimeter of the Project site (east of Burnet Road) and north of the electric transmission line easement. It is, therefore, anticipated that the Park can be developed without impacting existing wetlands. To the extent development occurs beyond the approximately 732 acres, when a specific development is proposed, field reconnaissance, and if necessary, a wetland delineation, will be conducted prior to actual site development, to identify the design that avoids and minimizes the potential for wetlands impacts.

The goal of avoiding wetland impacts will be furthered by field reconnaissance that confirms the limited extent of regulated jurisdiction wetlands on the Project site compared with mapped wetlands. The new Navigable Waters Protection Rule changed the definition of “waters of the United States,” which narrowed the scope of wetlands that fall under federal jurisdiction compared to the rule that was in place at the time of the prior FGEIS in 2013. Under the new Rule, only “adjacent wetlands” that abut or have a direct connection with jurisdictional waters, such as navigable waters and tributaries, fall under USACE jurisdiction. Ephemeral streams, certain ditches, and prior converted cropland, among other features, are not regulated. Because NWI maps only indicate the potential presence of wetlands but are not jurisdictional maps, mapped wetland areas would be subject to the newly revised rule.

After wetland areas are delineated (including state wetland 100-foot adjacent areas) and determined to be jurisdictional based on a conceptual layout, measures to avoid and minimize wetland impacts to the maximum extent practicable will be incorporated into the development design. Mitigation would not be necessary if wetlands are preserved.



- Author:Dennis R. Roote, P.E. Subject:Rectangle Date:6/7/2021 12:51:53 PM

Concur
- H

Author:Dennis R. Roote, P.E. Subject:Highlight Date:6/7/2021 12:53:32 PM

Fully concur. The project must include a wetlands delineation.
- H

Author:Dennis R. Roote, P.E. Subject:Highlight Date:6/7/2021 12:55:37 PM

Fully Concur



If complete avoidance is not practicable for development activities that are not exempt from regulation, development would proceed with permits issued by NYSDEC and/or the USACE. NYSDEC has a designated Class II and a designated Class III wetland near or within the Project site, which are associated with intermittent streams that flow into Youngs Creek, an unregulated Class C, non-navigable stream. A permit application would be submitted to NYSDEC, or a Joint Application to the NYSDEC and USACE in a case of concurrent jurisdiction. Issuance of a permit would be based, in part, on a showing that losses or impacts on the functions and benefits of the wetland have been minimized and the social and economic need for the Project. Required mitigation would likely be minimal because of measures to avoid and minimize impacts, but on-site mitigation areas are available within and north of the NYPA/ National Grid electric transmission line easement, which would allow for a 2:1 mitigation ratio. Onsite mitigation can exist outside of the site boundaries, but within or contiguous to the impacted wetland. This will ensure that the size and integrity of the wetland will be maintained, and lost functions and benefits are replaced in-kind. If onsite mitigation is not feasible or suitable locations are not present, possible off-site mitigation options will be considered in consultation with the NYSDEC. Monitoring would be required for a minimum of five years.

Encroachments on federal jurisdictional wetlands (not jointly associated with NYSDEC wetlands) can be mitigated through purchase of in-lieu fee credits from wetland banks; several wetland banks with credit capacity are available for future development if impacts cannot be avoided; no long-term monitoring is required for in-lieu fee mitigation. USACE review may be further expedited by approval through a Nationwide General Permit or Letter of Permission depending on the scale of future development. At this time, because there is no specific development proposal before OCIDA, potential development-specific impacts to wetlands, if any, cannot be evaluated.

### ***Proposed Utility Line Routes***

The same practice of avoiding, minimizing, and if necessary, mitigation of impacts to wetlands will apply to the installation of utilities. Chapter 3, Section 3.8 describes several potential small to medium size mapped wetland areas that will need to be delineated and may fall under the jurisdiction of the USACE as federal wetlands unless excluded by the Navigable Waters Protection Rule. One potential avoidance measure, if necessary, would be to install the utility lines using horizontal directional drilling (HDD) methods to avoid wetland impacts. The need for HDD installation will be determined after a field reconnaissance and delineation to determine if regulated wetlands are present and may be impacted once the conceptual Project site layout is complete.

### ***Proposed Roadway Improvements***

The same practice of avoiding, minimizing, and if necessary, mitigation of impacts to wetlands will apply to the proposed roadway improvements. Based on previous wetland delineations performed under the 2013 FGEIS and the wetland evaluation for the expanded Park, there will be no impacts on wetlands at the proposed site driveway entrance on NYS Route 31 or at the NYS Route 31 and Henry Clay Boulevard Intersection. Although TES previously identified Wetland D in close proximity to the proposed driveway entrance for Caughdenoy Road, the delineation was performed prior to the enactment of the Navigable Waters Protection Rule, which narrowed the definition of jurisdictional wetlands. Wetlands were not evaluated in the vicinity of I-81/NYS Route 31 Interchange. These and other NWI-mapped wetlands will





be further evaluated when a more specific development is proposed to determine actual jurisdictional wetland boundaries.

The NYSDEC map identifies a Class II wetland located southeast of NYS Route 31. This wetland's check zone (as shown on Figure 3.8-1) encompasses portions of NYS Route 31 where full depth asphalt, mill and overlay, concrete sidewalks, and grading limits are being proposed. Check zones measure to 500 feet for wetland polygons and 200 feet around linear wetlands. Check zone should not be confused with the regulated "adjacent area". If wetland or adjacent area impacts cannot be avoided, permitting would proceed as described above.

A formal delineation using state and federal criteria has not been conducted at this time but will be completed prior to detailed engineering design if these roadway improvements are chosen by a developer as the most feasible alternative.

#### **4.8.2 Vegetation**

Most development in the proposed expanded Park would be south of the transmission lines and west of Burnet Road. Within this area, the Park is anticipated to disturb approximately 400 acres of upland land cover, remaining outside of, and avoiding any impacts to wetland areas.

Anticipated impacts include the temporary and permanent loss of vegetation. This includes the removal of existing trees and the disturbance or stripping of existing ground cover during construction. The development will also include the conversion of existing vegetated cover into impervious surfaces.

#### ***Minimization and Mitigation***

A preliminary design objective in developing the Park is to balance the amount of industrial development with avoidance and/or minimizing impacts to sensitive features. This includes vegetation, as it pertains to wetland areas and specific wildlife habitats. These areas would be avoided to the maximum extent practicable through careful site planning and design. Impacts, if any, to wetlands will be compensated as previously discussed in section 4.8.2. Additionally, mitigation measures for soils are identified in section 4.5, mitigation for water resources are identified in section 4.6 of this report.

Furthermore, in areas where vegetative restoration is required, the following will be considered:

- Establish 90% permanent ground cover within one growing season (one year) following construction.
- Seeded areas should be evaluated and reseeded as necessary to achieve 90% cover as soon as practicable.
- On flat areas (less than 30 percent slope), mulch (i.e., straw, burlap, chips, etc.) can be applied to aid temporary and permanent restoration and soil stabilization.
- On steeper slopes (in excess of 30 percent slope), mulch and jute nets or erosion control fabrics may be used to provide temporary soil and site stabilization.
- Erosion control fabric can be installed per manufacturer's recommendations. These materials may be placed to minimize soil erosion and surface water runoff on disturbed sites.





Author:Dennis R. Roote, P.E. Subject:Highlight Date:6/11/2021 12:37:02 PM

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This statement raises the question: Do the Burnett Road properties need to be impacted?



Author:Dennis R. Roote, P.E. Subject:Rectangle Date:6/7/2021 12:59:31 PM

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Concur

- In areas where slopes are in excess of 25 percent or in stream banks, mulch may be anchored or a tackifier may be applied.
- Erosion control fabrics may be installed cross slope on short hills and stream banks.
- On long grades or in runoff ditches, where erosion control fabrics are determined by an environmental inspector to be necessary, fabrics can be installed parallel to the slope with the edges of adjacent sheets overlapped and secured with pegs or stapled to the ground, per the manufacturer's specifications.
- All erosion control fabric installation should be conducted in accordance with the manufacturer's specifications.

#### 4.8.3 Wildlife

Based on the wildlife species observed on the site, potential development at the expanded Park has potential to affect common wildlife species and their associated habitats as described in detail in Chapter 3, section 3.8.3. This includes the five amphibians, two reptiles, 68 birds, and six mammal species identified in the TES report. (See table 3.8-2 in Chapter 3, section 3.8.3.)

Although impacts to critical habitat would be minimized to the greatest extent possible through avoidance and mitigation, potential impacts to wildlife species during development may include habitat fragmentation, habitat loss, and disturbance. Vegetative loss would temporarily disrupt the common wildlife species that inhabit the site; however, it is anticipated the transient wildlife in these areas would adapt during site development and following project completion, either by relocating to suitable areas in other areas on site or to surrounding areas.

No substantial critical habitat loss is anticipated as a result of the potential development at the proposed expanded Park. Specific impacts and mitigation measures regarding wetland areas and vegetation are described above in sections 4.8.1 and 4.8.2, respectively.

#### *Mitigation*

Installing the proposed utility corridors, site development, and roadway improvements may include temporary disturbance to wetland areas and other wildlife habitat. For those areas that are mowed and maintained (e.g., existing utility right-of-way), there will be minimal change in habitat character. Best management practices during construction with erosion and sediment controls will prevent siltation into any aqueous habitats. However, in areas where complete habitat avoidance is not practicable, the following mitigation will be considered:

- Retain/maintain existing habitat tracts, whenever feasible.
- Compensatory mitigation (e.g., wetlands) for any habitat loss, as described above in section 4.8.2.

#### 4.8.4 Threatened or Endangered Species

As in 2013, there are no critical environmental areas or significant natural communities within or in the vicinity of the project area. Based on the available resources reviewed, there are no threatened and



endangered animal species identified by the NYSDEC/NYNHP and USFWS known to inhabit or frequent the Project site.

### ***Mitigation***

As there are no anticipated impacts to rare, threatened, or endangered wildlife species or communities, specific mitigation is not required. Future site development activities, including utility line construction and roadway improvements, however, will be monitored for any occurrence of the identified potential threatened, endangered, or species of special concern, including the Sedge wren, Eastern massasauga, Indiana bat, Osprey, and Sharp-shinned hawk to ensure that construction activities will avoid any direct harm to these listed species.

Additionally, the following USFWS recommendations, which restrict and/or prohibit incompatible construction practices should be followed, if any potential habitat/species is recognized through site reconnaissance. Additional coordination with NYSDEC should also be made prior to the commencement of development activities for concurrence and further guidance, as wildlife/habitat survey(s) may be required (i.e., a grassland breeding bird survey):

- *Indiana bat*: Follow seasonal restriction on tree cutting. Only cut trees between October 31 and March 31.
- *Sedge wren*: Prohibit incompatible practices, such as mowing and haying during the breeding season (May 1 to September 30).
- *Eastern massasauga*: Complete activities that occur within streams and/or wetlands from June 1 to August 31.
- *Osprey*: Prohibit construction activities during nesting (April 1 to August 31).
- *Sharp-shinned hawk*: Prohibit construction activities during the breeding season (March 31 to June 1).

## **4.9 Cultural & Archeological Resources**

### ***Impacts***

The development of the approximately 1,250± acre Project site will result in the demolition of all of the existing buildings located within the project site. OCIDA will follow recommendations of New York State Historic Preservation Office (SHPO) with regard to further examination or assessment of above-ground resources. Construction of the underground utility corridors and in the vicinity of roadway improvements is not likely to impact above-ground historic resources, given their location within or adjacent to existing rights-of-way.

In 2013, EDR conducted a Phase IB archaeological survey and identified no significant archaeological sites within an approximate 340± acre area on the west side of the project site or along the extent of the



proposed sewer line. Therefore, potential archaeological impacts are limited to the approximately 910 acres remaining within the expanded Park site, the proposed utility lines, and any adjoining routes, rights-of-way, and/or other areas needed to support the project or project-related mitigation including existing or proposed infrastructure and improvements that have not previously been examined. On March 5, 2021, OCIDA received a letter from the New York State Department of Environmental Conservation which stated “[W]e have reviewed the statewide inventory of archaeological resources maintained by the New York State Museum and the New York State Office of Parks, Recreation, and Historic Preservation. These records indicate that the project is not located within an area considered to be sensitive with regard to archaeological resources.” OCIDA will follow recommendations of SHPO with regard to potential impacts to archaeological resources.

### ***Mitigation***

The SHPO is an involved agency and OCIDA will follow their recommendations with regard to any further evaluation of cultural and archeological resources within the expanded Park. Should any work be required by SHPO, it will be completed by professionals meeting the Secretary of the Interiors Standards. In the event that previously unidentified historic properties or archaeological resources are discovered or if unanticipated effects on historic properties or archaeological resources occur during construction activities, the contractor will stop construction work in the area of the property/resource and coordinate with OCIDA and the SHPO. Should human remains be encountered appropriate actions will immediately be taken to stop work in the surrounding area and cover and secure the remains until the appropriate authorities have been contacted.

## **4.10 Visual Environment & Aesthetic Resources**

### **4.10.1 Visual Impact Assessment**


A Visual Impact Assessment of the project area was performed for a previous industrial scenario at the Park by Integrated Site, Landscape Architects, P.C. in 2000, but its assumptions and conclusions remain valid. Due to the expansion of the Park, and the issuance of the 2019 New York State Department of Environmental Conservation’s Program Policy DEP-00-2 “Assessing and Mitigating Visual and Aesthetic Impacts”, an updated Visual Impact Assessment was performed to supplement the original. This assessment is included as Appendix D.


The updated assessment included a review of previously identified sensitive receptors, identification of new receptors as defined by the 2019 NYS Policy, assessment of views from those locations, and identification of mitigation strategies for potentially impacted locations. The 2019 policy focuses on resources of National, State, and local significance that are open to the public.


### ***Impacts***

The updated Visual Impact Assessment identified a total of 52 sensitive receptor locations that could potentially be impacted by development of the Park. Of those 52 locations, 34 were identified in the previous assessment and 18 were additional locations identified within a 5-mile radius of the Park.



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 Author:Dennis R. Roote, P.E. Subject:Sticky Note Date:6/7/2021 1:16:22 PM  
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Specific publicly accessible locations identified based upon the DEP 2019 policy category list include the following:

- Oneida Shores County Park
- New York State Barge Canal Historic District
- Cicero Swamp Wildlife Management Area
- Big Bay Swamp
- Stanley J. Hamlin Wildlife Management Area
- Erie Canal National Heritage Area

Based upon their distance from the site, the relatively flat topography, and the presence of forested areas or patches between the location and the site, all these resource locations will have their view to the Park screened.

The following private or local resources were identified as having partially screened views to the Park:

- Immanuel Church – NYS Route 31 (viewpoint #8)
- Great Northern Mall (viewpoint #11)
- Calvary Church – Mud Hill Road (viewpoint #17)
- Airline Enterprises – Verplank Road (viewpoint #20)
- Hays Airfield – Route 11 (viewpoint #28)

The following two locations were determined to have open views to the Park:

- Caughdenoy Road power substation (viewpoint #1)
- Heron Marsh – Caughdenoy Road (viewpoint #34)

### ***Mitigation***

Sites determined to have partial or open views to the site will be further assessed as the site development plans are advanced. The developers will work with the county and local agencies during the site development process to identify the best strategies to mitigate any potential visual impacts from the proposed development. Each site will be individually reviewed based upon the site development plans to determine the type and extent of the visual impacts, and to reach consensus on the most appropriate site-specific methods of mitigating those impacts. Based upon the criteria identified in the 2019 NYSDEC Policy, no significant adverse visual impacts to identified public resources are anticipated.

Best management practices implemented during design and construction of the Park will mitigate several visual impacts anticipated from the industrial development of the site. More site-specific measures that can be implemented to mitigate visual impacts of the project will be identified and discussed during the Town's Site Plan review and approval process once the specific development is proposed. No significant adverse visual impacts are anticipated.

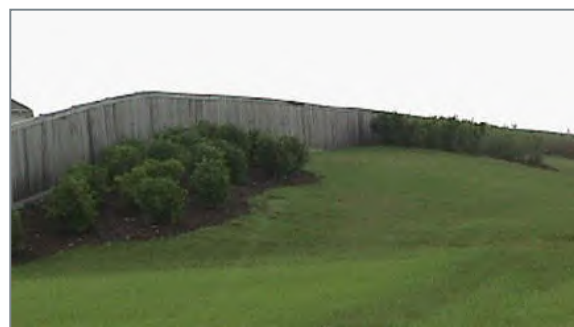
Mitigation strategies that may be considered in developing the site include:

- **Construction and Placement of Earthen Berms:** Earthen berms along with landscape plantings and/or fences for screening will interrupt critical viewpoints into the site from several nearby locations. In particular, the residences along Caughdenoy Road west of the site and along Burnet



Road to the east. Berms should be constructed at sufficient heights to block lines of sight from nearby receptors and at no greater than a 3:1 slope to prevent soil erosion and for easier maintenance. A contoured slope of 4:1, 5:1 or gentler ratio is preferable. As the site design process moves forward, berm design and placement will be carefully considered to provide a natural appearing landscape that is context sensitive to its surroundings.

- **Native Plant Material:** Landscape plantings will favor native plant species to maximize survivability rates and to reduce future maintenance costs. A well-designed plant palette consisting of deciduous and evergreen trees and shrubs will be utilized in conjunction with berms, fencing and/or walls to screen certain facilities and parking areas from nearby residents. The plant palette will provide year-round visual interest with flowering, fall color, and evergreen characteristics.



*Berms can be designed combining vegetation, landscaping, and screening walls or fencing at sufficient heights to interrupt the lines-of-sight from nearby receptors. These barriers can be effective in mitigating visual and to some extent noise impacts, particularly views and noise generated at ground level by ground operations on site.*

- **Forested Buffers:** Opportunities to retain existing forested buffer areas around the perimeter of the site will be identified. This will aid in minimizing views into the site and reducing potential noise and light emanating from the site. The effectiveness of forested buffers to reduce visual and noise intrusions increases with width.
- **Context Sensitivity:** Landscape plantings will be designed to complement the surrounding landscape and provide a less intrusive visual element. As an example, randomized plant layouts in disturbed areas adjacent to currently undeveloped areas will appear more natural and create less visual clutter. Form and function of the planting will be balanced to provide visual screening as quickly as possible with faster growing species, both deciduous and evergreen. Other areas may require more formalized plantings with densely spaced evergreen plant material to visually screen and/or provide mitigation for noise and light intrusion from the site.
- **Camouflage/Disguise:** Colors and patterns of color will aid in minimizing the visual effects of an object on its surrounding viewshed. The utilization of earth tones and similar color schemes in the design of buildings and structures on the site will reduce the visual contrast with surrounding



landscapes. As an example, disguising communication towers as trees is a long-standing design tactic that has been successfully implemented on other sites.

- **Low Profile and Consolidation:** The design of buildings and other supporting facilities should be to the lowest practicable heights. Consolidation of facilities may reduce the development footprint, and thus, lessen the visual impacts. Alternatives considering the height, color and capacity requirements of water towers, communication towers, smokestacks, piping, transmission lines, etc. should be explored to mitigate potential views from off-site locations.
- **Site Lighting:** Light illumination levels on the site must adhere to engineering minimums for security which may result in light pollution outside the site. By utilizing the latest technology with appropriately sized light poles and fixtures, the effects of light spill over can be minimized. Cutoff LED fixtures are efficient and provide more accurate direction of the light. The most efficient combinations of light pole and fixture will be implemented to reduce light spill over to the greatest extent practical without sacrificing safety and security.
- **Site Entrances:** Site entrances and entrance roadways may be engineered to be curvilinear to minimize views into the site from local roads. Installing landscape plant material to obscure the views into the site at entrances can be beneficial, but clear sight lines must be maintained for the safety of all users including bicyclists and pedestrians.
- **On-Site Opportunities:** Integrating opportunities for visual mitigation and noise mitigation efforts with other site design considerations such as stormwater management areas, safety and security features, fencing, berms, screening walls, building placement, landscaping, etc. will be explored.

#### 4.10.2 Lighting Impacts and Mitigation

##### *Impacts*

The proposed project will require exterior lighting in the form of roadway, parking lot, and building exterior lighting, to provide adequate safety and security for the employees and visitors to the site. The goal of the site lighting plans will be to provide the necessary light levels for safety and security onsite, while avoiding or minimizing glare, reducing light trespass, and reducing skyglow. The lighting design for the site will seek to use Dark Sky friendly lighting fixtures.

##### *Transportation Lighting*

The lighting design for the approach roadways (NYS Route 31 and Caughdenoy Road) and interior roadways on the site will follow the Illuminating Engineering Society (IES) Recommended Practices for lighting of exterior environments (RP-33-99) and for parking lots (RP-20) to avoid or minimize glare and trespass lighting.

The lighting design for the roadways and parking lots will direct light downward using techniques such as cutoff fixtures and shielding. These techniques have proven to be effective in minimizing glare and trespass light that may be detrimental to humans, plants, and animal species surrounding the developed areas of the site and its approach roads.



The proposed roadway improvements outside the site will be designed with standard roadway lighting complying with the current NYSDOT HDM Chapter 12 and the NYSDOT Policy on Highway Lighting for highway lighting. Prior to installation of new highway lighting, the locality must agree to be responsible for the operation and maintenance of the new fixture. The luminaire selection for the roadways will be specified according to the IES. The lighting equipment will be selected based on the locality preferences and standards specified in the NYSDOT HDM. Lighting solutions that may create spillover or glare on offsite resources will not be considered for lighting of the roadways.

#### ***Exterior Lighting of Structures***

The facility structures for the development will require exterior lighting for safety and security of employees and visitors. As the project moves to more detailed design, the designers will employ Dark Skies guidelines to ensure that exterior building lighting will focus all lighting down toward the ground to minimize spillover of light upward.

#### ***Obstruction Lighting***

The site is within five miles of the of the Syracuse Hancock International Airport. This falls within the limits of requirements for obstruction lighting of any onsite structure 200 feet tall or greater. (USDOT FAA Advisory Circular AC70/7460-1M dated 11/16/2020). The development of the site has established a maximum height of 160 feet for any structures built on the site. This would indicate that there will be no requirements for Obstruction lighting on the site. Further coordination with the Syracuse Hancock International Airport and the FAA during site design will be required to confirm that no structures erected on the site will require Obstruction Lighting.

## **4.11 Noise**

### **4.11.1 Impacts**


The nature of potential noise impacts resulting from development and operation of the Park have not changed significantly since the completion of the 2013 FGEIS. However, the expanded footprint of the Park and the proposed roadway improvements include additional areas that require noise impact assessment for construction and operation activities.

The proposed expanded Park includes areas currently zoned for industrial uses as a right of use, as well as areas currently zoned for residential and agricultural uses (see Section 3.1.2). Industrial development has the potential to cause an increase in environmental sound levels in the vicinity of the Park due to industrial operations and employee and delivery traffic. Traffic will be comprised of both automobile and truck traffic, but the composition of new traffic is uncertain until specific industrial tenants are known.


Depending on specific industries, noise from manufacturing processes, public address systems, building heating, ventilation and cooling systems, truck movement, and back-up alarms may, among others, all be potential sources of noise. Future tenants may need to assess the impacts of their operations on ambient conditions as part of the Town's site plan approval process. Traffic and site operations are expected throughout the day and at night depending on operational requirements. Most sources are considered stationary but may vary in intensity and duration.



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Construction noise is an unavoidable impact of land development activity and will vary daily and by season. Noise will originate from the use of heavy equipment for land clearing and earthmoving. Impacts will be highly variable as equipment moves around the site and external construction areas.

### **Assessment Guidance**

As discussed in Chapter 3, the NYSDEC guidance document, *Assessing and Mitigating Noise Impacts* provides noise impact assessment procedures and identifies potential mitigation practices. The NYSDEC guidance states:

*“When certain criteria are satisfied, the need for undertaking a noise impact analysis at any level is eliminated. These criteria are as follows:*

- a) The site is contained within an area in which local zoning provides for the intended use as a “right of use”. It does not apply to activities that are permissible only after an applicant is granted a special use permit by the local government; and*
- b) The applicant’s operational plan incorporates appropriate best management practices (BMPs [see Section V.C. Mitigation - Best Management Practices]) for noise control for all facets of the operation.*

*Where activities may be undertaken as a “right of use”, it is presumed that noise has been addressed in establishing the zoning. Any residual noise that is present following BMP implementation should be considered an inherent component of the activity that has been found acceptable in consideration of the zoning designation of the site.”*

NYSDEC guidance provides for different impact threshold levels for projected noise over ambient sound levels. To this, the guidance document also states:

*“The goal for any permitted operation should be to minimize increases in sound pressure level above ambient levels at the chosen point of sound reception. Increases ranging from 0-3 dB should have no appreciable effect on receptors. Increases from 3-6 dB may have potential for adverse noise impact only in cases where the most sensitive of receptors are present. Sound pressure increases of more than 6 dB may require a closer analysis of impact potential depending on existing SPLs (Sound Pressure Levels) and the character of surrounding land use and receptors. SPL increases approaching 10 dB result in a perceived doubling of SPL. The perceived doubling of the SPL results from the fact that SPLs are measured on a logarithmic scale. An increase of 10 dB(A) deserves consideration of avoidance and mitigation measures in most cases.”*

NYSDEC guidance states that typical human reaction to increases in decibel levels are as follows:

- |                             |                                   |
|-----------------------------|-----------------------------------|
| • Under 5 decibels increase | Unnoticed to Tolerable            |
| • 5 - 10 decibel increase   | Intrusive                         |
| • 10 - 15 decibel increase  | Very Noticeable                   |
| • 15 - 20 decibel increase  | Objectionable                     |
| • Over 20 decibels increase | Very Objectionable to Intolerable |



This noise impact assessment also considers the project in relation to local ordinances. Section 152-4 of the Clay Town Code, denoting specific performance limits on noise in industrial districts and limits on construction activity, and Section 143 of the Town of Cicero Town code specifying limits on construction activities, are discussed in Chapter 3, Section 3.11.

Noise levels generally decrease at an attenuation rate of 6 dB(A) per doubling of distance under ideal conditions. In other words, a receptor located approximately 100 feet from the source would be expected to experience a level that is 6 dB(A) less than a receptor located 50 feet from the source.

In reality, projected noise levels are influence by local variables, including weather conditions and the screening effects of vegetation and topography, and observations are likely to vary from the idealized model. In many cases, observed sound levels at receptors may be lower than anticipated due to the screening effects of intervening topography, structures and vegetation, and atmospheric absorption of sound energy.

### ***Preliminary Noise Assessment***

Although specific industrial uses and the scale of their development are not known some assumptions on noise can be based on a potential development and a conceptual footprint based on the prime developable area. For assessment purposes several assumptions can be made concerning development and potential noise sources including:

- Construction-associated noise will be produced during construction of on-site infrastructure, including demolition of existing structures, installation of roadways, parking areas, utilities, stormwater management areas, buildings, as well as during construction of improvements to existing infrastructure external to OCIDA's property boundaries, including new utility installations and improvements to nearby roadways.
- Operations including vehicle traffic and equipment movement along internal roadways, utility/storage yards and parking areas will generate noise. Manufacturing processes and building mechanical systems (heating, ventilation, air conditioning, etc.) may also create exterior noise.

To estimate potential noise levels, five residential areas near the expanded Park area were considered representative of other nearby receptors. Distances between noise generated on site and the property lines of the proposed expanded Park and these receptors were determined using publicly available mapping, including aerial photos. Typical noise levels that may be generated by the project were estimated using NYSDEC guidelines and other source materials from the Federal Highway Administration, Federal Railroad Administration, and website research.

The five receptors include:

- a) A home approximately 800 feet north of the Caughdenoy Road/NYS Route 31 intersection representative of at least five other residences along the west side of Caughdenoy Road
- b) A home approximately 2,700 feet north of the Caughdenoy Road/NYS Route 31 intersection on the west side of Caughdenoy Road just south of the Jerome Fire Equipment Company



- c) A home on the east side of Caughdenoy Road approximately 750 feet north of the existing CSX grade crossing, approximately 150 feet west of the Park's property boundary representing two other homes in the vicinity
- d) A home south of the Park's property line and the Old Route 31 right-of-way. This is north of NYS Route 31 and represents other residential parcels in this vicinity
- e) A home in a residential development east of the Park's property line on Meltzer Court

### ***Construction Noise***

Construction noise differs from operational noise in several ways:

- Construction noise is highly variable and somewhat unpredictable depending on the type of equipment and its location relative to a receptor. Construction traffic noise varies by vehicle and by where along the travel path the vehicle is located relative to the receptor.
- Construction generally occurs during daytime hours when most receptor activity is occurring outside and less likely to adversely affect outdoor activity unless it is based on recreation or similar outdoor uses that may rely on quiet conditions.
- Construction activity is generally short-term and more acceptable as such.

Noise levels generated during construction activities within the Park were estimated using information for different types of construction equipment by determining levels at specific distances from the source based on typical noise attenuation rates. Noise levels for construction equipment are presented in Table 4.11-1. These levels are based on a reference distance of 50 feet from the source of noise (engine, muffler, etc.), as obtained from the NYSDEC guidance and Federal Highway Administration Construction Noise Handbook<sup>1</sup>.

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<sup>1</sup> Construction Noise Handbook Final Report, US Department of Transportation – Federal Highway Administration, August 2006



Table 4.11-1: Typical Construction Equipment Noise Levels		
Construction	Typical Noise Level dB(A)	
Equipment	at 50 Feet from Source	
	FHWA	NYSDEC
Air Compressor	81	-
Backhoe	80	83-86
Concrete Mixer	85	63-71
Concrete Pump	82	-
Crane	83	-
Dozer	85	80
Generator	81	78
Grader	85	85
Jack Hammer	88	82
Loader	85	-
Paver	89	-
Pile Driver	101	-
Roller	74	-
Scraper	89	-
Shovel	82	-
Truck (Dump)	88	91

Sources: FHWA Construction Noise Handbook &  
NYSDEC "Assessing and Mitigating Noise Impacts" 2001

Potential development would include demolition, on-site construction activities within the Town of Clay and roadway improvement construction in the Town of Clay and the Town of Cicero. For the purposes of this preliminary assessment, it is presumed that construction activities will take place within the hours specified in the respective town codes.

For estimating construction noise three pieces of equipment were assumed to be operating simultaneously in the same area of the site. A dump truck at 91dB(A), a grader at 85dB(A) and a dozer at 80dB(A) combining for a total 93 dB(A) at 50 feet per the NYS DEC guidance document. The potential noise levels experienced at the five receptor locations are indicated in Table 4.11-2.



<b>Table 4.11-2 Potential Construction Noise at Receptors</b>								
Receptor Number	Distance from OCIDA PL to Receptor PL	Representative Day Time Ambient Sound Level	Construction Noise at OCIDA PL w/o screening	Distance from Town Setback/ Building Line to Receptor PL	Construction Noise at Receptor PL with w/o buffer screening	Construction Noise at Receptor PL with w/ buffer screening	Combined Noise at Receptor PL with w/ buffer screening	Increase in Sound Level at Receptor PL with w/ buffer screening
1	50 ft.	72.9 dBA	81 dBA	250 ft.	79.5 dBA	74.5 dBA	76.5 dBA	3.6 dBA
2	50 ft.	63.6 dBA	81 dBA	250 ft.	79.5 dBA	74.5 dBA	74.5 dBA	10.9 dBA
3	50 ft.	63.6 dBA	81 dBA	350 ft.	77.0 dBA	72.0 dBA	73.0 dBA	9.4 dBA
4	50 ft.	72.9 dBA	81 dBA	250 ft.	79.5 dBA	74.5 dBA	76.5 dBA	3.6 dBA
5	50 ft.	51.0 dBA	81 dBA	250 ft.	79.5 dBA	74.5 dBA	74.5 dBA	23.5 dBA

If assumed to be operating at the required Town setback line of 200 feet from the expanded Park boundary the noise level at the property line would be approximately 81dB(A). At receptor property lines the noise levels would be slightly lower at approximately 79.5 dB(A) at the three nearest receptors. This noise level assumes no additional attenuation by topography or vegetation in the 200-foot project buffer.

Dense vegetation may reduce noise levels further between 3 to 7 dB(A) per NYSDEC guidance which is reflected in the last column of Table 4.11-2 where the reduction in noise levels was assumed to be mid-point at 5 dB(A). Topographic screening and/or constructed barriers have the potential to reduce sound propagation by significant measures (in excess of 10 dBA), depending on orientation. A combination of earthen berms and/or vegetation would create additional attenuation if the line-of-sight is effectively blocked. Effective berms at sufficient heights could reduce levels further from those shown in the last column of Table 4.11-2.

NYSDOT construction noise guidelines recommend maximum allowable levels of 80 dB(A) at a receptor. Such levels are most likely to occur within 200 feet of a noise source and on site because of the existing 200-foot setback along Caughdenoy Road and NYS Route 31 at the Park. For example, assuming a maximum noise level generated by several pieces of equipment operating at 93 dB(A) at 50 feet and attenuation of 12 decibels at 200 feet would result in the 81 dB(A) shown above. At 400 feet the sound level would decrease to 74 dB(A) and less than 65 dB(A) at about one-quarter mile.

In general, the closest residences to the site (and on-site construction activity) are about 300 feet from the outermost building line (setback) allowed by local zoning. Thus, construction noise levels at a nearby off-site receptor at this distance would be approximately 77 dB(A) or about 3 decibels below the 80 dB(A) NYSDOT guideline.





Roadway improvements and utility installation may take place closer to nearby residents (about 100 feet from the centerline) and could experience slightly higher temporary levels. Temporary construction activity beyond the boundaries of the expanded Park that will be necessary for utility installation and roadway improvements along NYS Route 31 and Caughdenoy Road may result in noise levels at nearby residences greater than that which might be expected from on-site construction work.

### ***Operational Noise***

Operational noise from potential development at the proposed expanded Park is anticipated to include vehicle and equipment movement along internal roadways such as employee vehicles and delivery trucks; utility/storage yards and parking areas; manufacturing processes; and building systems such as heating, ventilation, and air conditioning.

Ambient sound levels at the Park location currently exceed “Steady-State” (operational) limits specified in the Town of Clay noise ordinance. Industrial operations at the proposed expanded Park do not present the potential to cause sound levels to exceed these limits at the property line. Therefore, this preliminary analysis evaluates potential impacts associated with operational noise resulting in sound levels above current ambient conditions.

Vehicular traffic speeds within the Park are expected to be controlled, and associated noise levels from vehicular traffic will correspond to NYSDEC’s categorization of *Light Auto Traffic*, producing sound levels of 50-55 dB(A) at a distance of 50 feet. Building systems would likely contribute sound levels on the order of NYSDEC’s level of approximately 60-65 dB(A) per unit at a distance of 20 feet. (See Figure 4.11-1)

Sound levels originating from multiple sources are additive. However, as decibels are measured on a logarithmic scale, source sound levels are also added logarithmically. As a result, a maximum combined sound level produced by multiple contributing sources is limited to approximately 10 decibels above the highest individual contributing sound level. Furthermore, as sound levels also decay logarithmically over distance, the additive effects of sound levels are limited by the proximity of the sound sources to one another. For the purposes of this preliminary analysis, combined operational sound levels within the operational footprint of the site (200 feet from the property line) are presumed to be a conservatively high 72 dB(A) at a distance of 50 feet.

Operational noise levels estimated for post-construction activity on site are shown in Table 4.11-3. In this instance, assuming an operational noise level of 72 dB(A) at 50 feet and attenuation of 3 to 7 decibels per distance doubling or assuming 5 dB(A) as mid-point, would result in 62 dBA at the proposed expanded Park’s property line and slightly less at nearby receptor property lines. Day-time ambient sound levels along Caughdenoy Road and NYS Route 31 currently exceed these operational sound levels projected to the Park property lines.

Dense vegetation may reduce noise levels further between 3 to 7 dB(A) per NYSDEC guidance, which is reflected in the last column of Table 4.11-3, where the reduction in noise levels was assumed to be mid-point at 5 dB(A). Topographic screening and/or constructed barriers have the potential to reduce sound propagation by significant measures (in excess of 10 dBA), depending on orientation. A combination of earthen berms and/or vegetation would create additional attenuation if the line-of-sight is effectively



blocked. With the addition of modest amounts of screening, the levels at receptors closest to the noise might be reduced to 56 dB(A). This assumes noise being generated up to the setback line on site, which may or may not be the case. A more likely scenario would assume noise levels are generated in more interior portions of the site, thereby resulting in noise levels slightly lower at receptor locations.

<b>Table 4.11-3 Potential Operational Noise at Receptors</b>										
Receptor Number	Distance from OCIDA PL to Receptor PL	Measured Representative Day Time Ambient Sound Level	Assumed Representative Night Time Ambient Sound Level	Operation Noise at OCIDA PL w/o screening	Distance from Town Setback/ Building Line to Receptor PL	Operation Noise at Receptor PL w/o buffer screening	Operation Noise at Receptor PL with w/ buffer screening	Day Time Combined Noise at Receptor PL with w/ buffer screening	Night Time Combined Noise at Receptor PL with w/ buffer screening	Night Time Increase in Sound Level at Receptor PL with w/ buffer screening
1	50 ft.	72.9 dBA	62.9 dBA	62 dBA	250 ft.	61.0 dBA	56.0 dBA	72.9 dBA	63.9 dBA	1.0 dBA
2	50 ft.	63.6 dBA	53.6 dBA	62 dBA	250 ft.	61.0 dBA	56.0 dBA	64.6 dBA	58.0 dBA	4.4 dBA
3	50 ft.	63.6 dBA	53.6 dBA	62 dBA	350 ft.	58.0 dBA	53.0 dBA	63.6 dBA	56.6 dBA	3.0 dBA
4	50 ft.	72.9 dBA	62.9 dBA	62 dBA	250 ft.	61.0 dBA	56.0 dBA	72.9 dBA	63.9 dBA	1.0 dBA
5	NA*	51.0 dBA	41.0 dBA	62 dBA	2,400 ft.*	40.4 dBA	<30.0 dBA	51.0 dBA	41.0 dBA	0.0 dBA

\*Presumes operations only to the west of Burnet Road

Operational noise, including during nighttime operations, observed at nearby residential receptors adjacent to the site may result in increases in sound levels from existing ambient conditions in the range of 0.0 to 4.4 dB(A).

### Impacts

The NYSDEC Noise Policy indicates increases in sound pressure levels of less than 5 decibels are considered “*unnoticed to tolerable*” by human hearing. NYSDEC guidelines further state that increases in sound pressure levels between 0 to 3 dB should have no appreciable effect on receptors. Changes in noise levels of 3 dB(A) or less are not perceptible by human hearing. An increase of 3 to 6 dB may have a potential for adverse noise impact in cases where the most sensitive receptors are present. An increase of more than 6 dB may require a closer analysis of impact potential depending on existing sound pressure levels and the character of the surrounding land use and receptors.

Furthermore, NYSDEC guidance states that the goal for any permitted operation should be to minimize noise levels above ambient levels at the chosen point of sound reception. The addition of any noise source, in a non-industrial setting, should not raise the ambient noise level above a maximum of 65 dB(A). Ambient noise levels in an industrial or commercial area may exceed 65 dB(A) with a high end of 79 dB(A). In these instances, mitigation measures utilizing best management practices should be used in an effort to ensure that a facility’s generated sound levels are at a minimum.



The analysis above indicates potential worst-case-scenario increases of sound levels at surrounding receptor property lines of up to 4.4 dB(A) during nighttime operations. Increases of this magnitude are considered “unnoticed to tolerable,” and present the potential for adverse impacts only in cases of the most sensitive receptors. These findings are predicated upon operational sound levels consistent with operational noise sources contributing 62 dB(A) at the Park property line. Operational sound sources resulting in projected sound levels at the Park property line in excess of 62 dB(A) may require additional analysis and/or mitigation.

Temporary and intermittent construction activities may have the potential to increase sound levels in excess of 10 dB(A) at nearby receptor property lines depending on the exact location of construction activities associated with a specific development proposal. NYSDEC notes increases in sound pressure levels of 10-15 decibels to be “very noticeable,” 10-15 decibels to be “objectionable,” and above 20 decibels to be “very objectionable to intolerable.” Increases in sound levels due to construction activities are an unavoidable temporary impact that may warrant additional mitigation.

#### 4.11.2 Mitigation

In many instances operational noise can be mitigated by site layout to increase the distance between noise source and receptor to the greatest extent possible. Additional reductions can be achieved by maintaining natural buffer areas as vegetative screens and constructing earthen berms or other noise barriers on site. Physically blocking the line-of-sight between source and receptor is effective in reducing noise levels to some degree.

The location and need for earthen berms and similar types of noise barriers will be confirmed at the time a specific tenant proceeds with site engineering and review by the Town. Earthen berms will be effective in reducing noise levels if sufficient in height, width, and length. Overall dimensions will need to be determined. A barrier may be required in lieu of a berm if space is restricted.

The placement of buildings, utility yards, equipment, and materials storage, loading docks, air compressors, etc. can influence noise levels at off-site receptors. Screening these areas from receptors east, west, and south of the Park may be necessary. Additional measures include installing enclosures of heating, ventilation, and air conditioning (HVAC) building systems and utilities. Noise from transportation sources can be mitigated by adjusting work and delivery schedules to distribute employee and truck traffic during hours of operation.

At a minimum, the following mitigation measures will be incorporated into the various phases of site development to reduce potential noise impacts.

- Community accessible information including construction schedules will be prepared by project tenants and made available at suitable locations (door-to-door, websites, town offices) to notify neighbors of upcoming work. A complaint resolution process will be implemented and monitored by the tenant and/or OCIDA during construction.
- All construction equipment will be maintained with properly functioning noise reduction muffler systems per manufacturer’s specifications as part of construction contracts and contractor responsibilities.



- Earth-moving equipment will be restricted from “tail gate banging” during sensitive times of the day (early morning and late evening) and when operating near residential receptors.
- Building construction near adjacent residential receptors will consider phasing opportunities and scheduling work to reduce potential noise impacts by erecting buildings, berms, stockpiling materials, structure placement, etc. to interrupt sight lines and therefore reduce noise levels being generated in the direction of sensitive receptors as construction advances on-site.
- Haul roads, access drives, materials storage areas, staging areas, etc. will be placed as far from sensitive receptors and internal to central portions of the site to the greatest extent practicable.
- Limiting construction to normal daylight hours to the greatest extent practicable. If nighttime construction is required, consideration will need to be given to use of variable level audible back-up alarms on heavy equipment, and/or use of strobe lights or other OSHA approved safety devices.
- Establish a project hotline (website and phone numbers) so residents can be kept informed of the status of project construction and obtain information for forwarding on complaints relative to construction activity due to noise, dust, work hours, etc.

## 4.12 Human Health

Due to the anticipated construction and operations of the expanded Park, there could be activities that cause some degree of change to the physical aspects of the surrounding area, including the potential for increased traffic, air emissions and noise. These changes have the potential to cause small to moderate impacts to the human health of surrounding residents including more “sensitive” receptors like nursing home residents and small children.

Future construction activities at the Park could create impacts associated with construction equipment noise, dust generation associated with earth moving/grading, and increased vehicular traffic. New manufacturing operations will result in some degree of air emissions, depending upon the specific manufacturing processes (see Section 4.7). Long-term site operations could also impact public safety due to increased traffic from the relatively large workforce.

Minimization and mitigation for temporary impacts during construction activities include restrictions on site access, hours of construction activity, delivery of equipment and materials to the site, measures to control dust from disturbed soil, best management practices for temporary fuel storage, and flagging/traffic control measures to protect all modes of travel within any construction area or public right-of-way.

General impact minimization and mitigation measures will require that the future site tenants obtain all necessary local, state, and federal permits, demonstrating that they are developing and operating the site in accordance with all regulatory requirements and laws. Operational procedures and avoidance measures will be established to minimize potential offsite impacts to human health. Mitigation measures for potential impacts during operation of new facilities include improvements in intersection designs, implementation of air emission control devices on industrial process, and vegetative and earthen noise barriers between new facilities and neighboring properties. Specific mitigation measures for traffic, air and noise are addressed in greater detail in Sections 4.3, 4.7, and 4.11, respectively.





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Past spills constitute relatively minor environmental incidents that are not expected to present any significant human health or environmental risks to the Project or surrounding community considering the small quantities of spilled material and the status of the spills (i.e., all dealt with to the satisfaction of NYSDEC). Furthermore, with one exception, the spills did not occur within the expanded Park boundaries. The one spill that did occur at the north end of Burnet Road only involved 2 quarts of oil and has been satisfactorily addressed. A Geotechnical Investigation Report<sup>2</sup> previously prepared for the Park did not encounter any adverse environmental conditions. There were two minor past spills that occurred in off-site areas where new utility lines could be constructed. In the unlikely event that any contaminated soil is encountered during construction, it will be segregated, sampled, and disposed of in accordance with applicable regulations.

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<sup>2</sup> C&S Engineers, Inc. Geotechnical Investigation Report (1996).



## Common Sound Levels

Sound Source	dB(A) <sup>o</sup>	Response Criteria
	150	
Carrier Deck Jet Operation	140	
	130	Painfully Loud Limit Amplified Speech
Jet Takeoff (200 feet) Discotheque Auto Horn (3 feet) Riveting Machine	120	
	110	Maximum Vocal Effort
Jet Takeoff (2000 feet) Shout (0.5 feet)	100	
N.Y. Subway Station Heavy Truck (50 feet)	90	Very Annoying Hearing Damage (8 hours, continuous exposure)
Pneumatic Drill (50 feet)	80	Annoying
Freight Train (50 feet) Freeway Traffic (50 feet)	70	Telephone Use Difficult Intrusive
Air Conditioning Unit (20 feet)	60	
Light Auto Traffic (50 feet)	50	Quiet
Living Room Bedroom	40	
Library Soft Whisper (15 feet)	30	Very Quiet
Broadcasting Studio	20	
	10	Just Audible
	0	Threshold of Hearing

**Figure 3.11-1:  
COMMON SOUND LEVELS**

Date Printed: 4/27/2021

Data Sources:  
Table E (page 19) from NYSDEC Assessing and Mitigating Noise Impacts, dated February 2, 2001.



## 5.0 CUMULATIVE IMPACTS

### 5.1 Cumulative Impacts

It is anticipated that the expansion of the Park and subsequent development of the Park for industrial semiconductor uses will induce similar cumulative impacts and effects to the area as was identified during the 2013 FGEIS. It remains possible that the expanded Park could be a catalyst to additional industrial and business development in this area, particularly, the area to the west of the Park along Caughdenoy Road that is already zoned for industrial uses (I-2) and areas south of the expanded Park where lands are vacant and currently for sale. The addition of the sewer line to and through this area further adds to the attractiveness to develop this area for industrial or business use.

There are several new developments in various stages of approval and review by the Town of Clay Planning Board. The two most relevant developments are a 60-unit senior housing complex along Brewerton Road east of the Park, which was recently approved by the Town of Clay Planning Board for construction. There is also a mixed use Planned Development District (PDD) on the corner of NYS Route 31 and Henry Clay Boulevard that will soon be presented to the Town of Clay Planning Board for approval. If approved, this new PDD will include approximately 100 +/- apartments and some mixed-use retail units on the bottom floors towards the front of the parcel. Given their distance from the Park, it is not anticipated that the construction of either of these potential developments would create cumulative impacts if constructed concurrently with the development of the Park.

The development of the expanded Park or any surrounding areas that develop as a result of development at the Park could create positive cumulative impacts and economic spin-off. This could include an increase in employment opportunities, increases in local discretionary spending providing additional sales tax revenues to State and local governments, demand for new goods and services support businesses, and further diversify the tax base of the Town of Clay.

The installation of a sewer force main along NYS Route 31/Caughdenoy Road intersection and northward along Caughdenoy Road paired with the various intersection improvements along NYS Route 31 will likely make this area attractive to industrial and business uses as well. Added industrial and business uses would increase traffic along NYS Route 31 and Caughdenoy Road. The additional traffic on NYS Route 31 could impact levels of service at several intersections and require improvements at a quicker pace than presently expected as discussed in Chapter 4, Section 4.3.

Potential new growth and economic expansion could create some adverse cumulative impacts. Changes in surrounding land use could put additional demand on sewer capacity and wastewater treatment at the Oak Orchard WWTP and may require upgrades to capacity at the plant to support future growth in the area. The conversion of undeveloped land to other uses will cause a loss of vegetation and wildlife habitat. Encroachment and impacts to environmentally sensitive features including, but not limited to wetlands and floodplains may occur. Changes in visual character from relatively undeveloped land to increased densities may also result. Depending on the nature and extent of development, there may be increased demand on municipal services for fire, police and emergency services. There may also be increased demand on housing, schools and local utilities. The mitigation of these potential impacts will need to be determined as new development projects are introduced and will need to be coordinated at that time with the Town of Clay and possibly other entities and involved agencies.





## 5.2 Mitigation

Road improvements and the provision of other infrastructure, particularly expanded sanitary sewer capacity at the Oak Orchard Wastewater Treatment Plant, and the potential cost implications for increased municipal services in anticipation of further development of the area would require local, state and federal funding. The establishment and implementation of policies at the Town and County level will be required to manage land use and infrastructure development along and especially north of the NYS Route 31 corridor to control the potential for adverse effects of additional development in the area. These policies may be established through the *Town of Clay Northern Land Use Study* and/or the Onondaga County Comprehensive Plan update. Implementation could also be accomplished through Town zoning and County Section 239 project reviews.



## 6.0 UNAVOIDABLE ADVERSE IMPACTS

### 6.1 Unavoidable Impacts

Many of the unavoidable adverse impacts that are likely to result from the expansion of the Park remain similar to those anticipated during the 2013 FGEIS. The difference is the geographic extent given the proposed Park expansion, which could result in greater impacts but also allow for additional buffers to avoid, minimize, and mitigate certain impacts (e.g., ecological, noise, etc.). The unavoidable impacts include the following.

#### 6.1.1 Construction Impacts

It is expected that the expansion of the Park and subsequent construction activities during the development of the Park will generate some temporary impacts as an unavoidable consequence of the development of the Park. These impacts and their intensity will vary throughout the development of the Park. Impacts are likely to include an increase in truck traffic on nearby roads, primarily NYS Route 31 and Caughdenoy Road as construction workers and materials are transported to and from the Project site.

As identified in the 2013 FGEIS, heavy machinery and construction equipment will be used throughout construction. As a result, noise levels will increase in surrounding areas during construction activity. Limiting the placement and storage of equipment and materials as far as possible from residences surrounding the Park will help to mitigate the increase in noise levels. Construction activities will also be limited to normal daytime hours whenever possible consistent with the Town of Clay Noise Ordinance requirements to minimize impacts to nearby residents.

Excavation and the transport of materials have the potential to create fugitive dust from unpaved surfaces depending on wind direction and drying conditions. Dust will be controlled by sweeping adjacent roads to the Project site and watering access roads on site as needed. In addition, in compliance with State water quality and stormwater management regulations future development will require a complete detailed Erosion and Sediment Control and Stormwater Pollution Prevention Plan prior to any construction. These plans will be developed by future project tenants in compliance with all local, State and federal regulations. Contractors working on site will also be required to follow best management construction practices to reduce the potential for soil erosion, dust, noise, traffic and other construction impacts.

#### 6.1.2 Traffic

An increase in traffic will result from construction and development of the expanded Park. Traffic is also projected to increase from other developments occurring in the area and will change the existing levels of service at certain intersections along NYS Route 31. Therefore, roadway improvements along NYS Route 31 are proposed based on existing and future traffic volumes. Regardless of development at the Park, transportation improvements will be required along NYS Route 31 as other development occurs over time.



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Concur. Improvements to 31 appear to be needed.

### 6.1.3 Air Quality and Noise

Future industrial use at the expanded Park will result in increased traffic, including employee vehicles, trucks, and the possible use of rail. This will increase noise and air emissions from the Park area. There will also be an increased use of energy, water and wastewater treatment resulting from development, but the exact degree of increase is unknown at this time. The use of natural gas for process heat demands and thermal oxidizers for the destruction of volatile organic compounds will generate combustion related air pollutants. The use of chemicals in manufacturing processes will generate non-combustion air pollutants. Emission control equipment will be utilized to reduce the emission rates and overall volume of released pollutants.

### 6.1.4 Ecology

Areas of open field cover type within the expanded Park will be developed. It is anticipated additional upland shrubland and woodland habitat areas will also be affected by the expansion. As the Park does have the potential to impact both state and federal jurisdictional wetlands, the associated habitat areas may also be impacted by development of the expanded Park. This is consistent with the findings of the 2013 FGEIS. Much of the Park will maintain its natural habitats as areas set aside from development. Some areas on site that may experience temporary disturbance from construction activities could return to vegetated locations, (i.e., stormwater management areas, landscaping, and visual buffers). Furthermore, it is anticipated that most wildlife would adjust to site development either by relocating to suitable areas on site or to surrounding areas.


### 6.1.5 Visual Character


Similar to the analysis in the 2013 FGEIS, the development of the expanded Park site will alter the visual character, which currently consists of single family rural residential plots, undeveloped rural open space comprised of former farm fields, and shrub and woodland. The future development at the expanded Park will instead include industrial buildings, parking areas, support facilities, and internal roads. It is anticipated that during development at the expanded Park wetlands within the Park will remain undeveloped.


Visual changes resulting from construction and development are unavoidable. Measures to reduce the effects of visual changes include the placement of additional vegetative buffers and landscaped berms at key locations around the site, particularly along the western and southern periphery of the site to screen views and mitigate noise.


The need for specific visual mitigation measures will be determined once tenants are known and the degree of potential visual impact is determined. Building placement, the use of attractive building materials and structural design features and landscaping will be encouraged by the OCIDA to enhance the appearance of buildings and grounds. Appropriate lighting fixtures and other site design features will be determined in coordination with the Town of Clay's site plan review process.





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### 6.1.6 Displacement of Existing Property Owners

For the objectives of the Project to be achieved, OCIDA must increase the size of the Park to make it more attractive to potential future tenants, specifically tenants in the semiconductor industry. The proposed expanded Park footprint requires that OCIDA acquire certain residences along Caughdenoy Road, NYS Route 31 and approximately 3 dozen residences along Burnet Road. These residential properties have been acquired or will be acquired by OCIDA through negotiated purchase agreements or pursuant to the Eminent Domain Procedure Law (EDPL) and existing owners will need to relocate. OCIDA must also acquire the property on which the existing telecommunication tower is located.

The properties along NYS Route 31 and Burnet Road represent a significant portion of the expanded Park's prime developable area and are therefore a necessary component of the Project. Existing structures and improvements will ultimately be demolished and/or removed in furtherance of the potential future development of the Park. Demolition activities will be conducted in accordance with Town of Clay requirements, and all debris will be disposed of at authorized off site facilities in accordance with applicable regulations. The telecommunications tower will need to be disassembled and relocated. The acquisition and removal of the residences along Burnet Road allows for the expansion of the Park footprint to accommodate large-scale campus like development for tenants and will enable maximum use of setbacks and buffers between the prime developable area of the Park and the nearest land uses to the east along and off of Brewerton Road in the Town of Cicero.

While the removal of the aforementioned residences and tower are unavoidable, owners will receive fair market value for their properties, thus enabling them to relocate within the Town of Clay or elsewhere. OCIDA will also pay the seller's normal transaction costs of updating the title and survey, recording fees, transfer taxes and other similar expenses in connection with the transfer of these properties as well as the pro rata portion of real property taxes, water rents, sewer rents, special ad valorem charges and other similar charges. In the event it is necessary to acquire any such properties pursuant to the EDPL, as condemnor, the Agency will offer just compensation based on the fair market value determined by its highest approved appraisal, and the respective property owners will have the right to challenge the amount of such just compensation under EDPL Article 5. The Agency will also pay, upon acquisition, any costs associated with recording fees, transfer taxes, penalties incurred by the condemnee for prepayment of any preexisting recorded mortgage entered into in good faith encumbering the property, and the pro rata portion of real property taxes, water rents, sewer rents, special ad valorem taxes and other similar charges.



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This language stems form the Eminent Domain Procedure Law and has been used throughout the document;  
however, alternatives to acquiring the property have never been discussed.

## 7.0 GROWTH-INDUCING IMPACTS

The growth-inducing impacts that are likely to result from the expansion of the Park remain similar to those anticipated during the 2013 FGEIS.

### 7.1 Population Growth

It remains reasonable to expect that the development of the expanded Park will result in some direct and secondary growth impacts to the surrounding community. Direct impacts will result from the development of the Park itself. Secondary impacts such as industrial-related support businesses or other commercial businesses being established near the Park are also possible.

Direct impacts will include job creation both on a temporary basis during construction and long-term employment once buildings and ancillary facilities are completed and become operational. It is anticipated that construction of a campus for a large semiconductor industrial tenant will occur over the course of a year or more.

Most job opportunities created during construction will be filled by the local labor pool. However, it is anticipated that the development of the expanded Park will bring approximately 4,000 full-time high paying jobs to Onondaga County. The potential exists for many of these new jobs to be filled by people that are not currently living within the Syracuse Metropolitan Area, meaning that there could be a proportional increase in the number of households in the Syracuse metropolitan statistical area (MSA) as well as the need for new housing.

It is estimated that the North Syracuse Central School District enrollment would increase by approximately 1.6%. This increase in school population is not anticipated to place an undue burden on local schools and educational facilities, mainly due to the recent decline in the Syracuse Metropolitan Area population and resulting decline in the student aged population.

### 7.2 Infrastructure-Induced Growth

The development of the expanded Park will necessitate the construction of new infrastructure. The most important infrastructure improvements that are needed to support the proposed development include the traffic mitigation improvements described in Section 4.1.10, the installation of sewer force mains being designed to support the greater Oak Orchard District and a gas line as described in Chapter 3 and 4, Sections 3.4.1 and 4.4.1, respectively.

Utility connections on-site will not result in substantial growth-inducing impacts since its effects will be in support of on-site uses, but these new utilities could encourage some new growth along their conveyance routes. The availability of public sewer has the potential to foster additional development in this portion of the Town of Clay, which remains relatively undeveloped at the present time. The ability to tap into the force mains is subject to State, County and Town of Clay review and approvals. As such, development will be managed by these entities and by the available capacity of wastewater treatment at the Oak Orchard Treatment Plant. Formation of a new sewer district to serve the Clay Business Park





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could help manage growth in the area. The County can service up to 4 million gallons per day (MGD) at Oak Orchard for the Park.

Transportation improvements along the NYS Route 31 corridor could also accelerate and accommodate increased development activity. Traffic improvements will be required along NYS Route 31 as development occurs. Traffic mitigation improvements proposed to support the expanded Park are not likely to induce further growth alone without other improvements along the corridor.

Development in the vicinity of the expanded Park could take several different forms at varying scales and densities depending on real estate market conditions and trends when new sewers come online. It is expected that future development in the vicinity of the Park will be in accordance with the Town of Clay Zoning Code and any related regulations or requirements in effect at the time. Under current zoning, this could translate into additional industrial development west of Caughdenoy Road and along NYS Route 31.

Development of residential uses could also occur in the vicinity of the Park as the result of sewer availability. Residential uses, perhaps as new residential subdivisions along NYS Route 31 south and east of the Project site, may occur in areas presently zoned RA-100.

All new development that occurs off-site will be subject to Town of Clay zoning requirements and site plan review. Such projects will also be subject to an environmental review under SEQRA conducted by the Town and/or other involved agencies at the time a specific project is proposed. Potential adverse environmental impacts will be identified, evaluated, and subject to project-specific mitigation measures on a case-by-case basis as part of the SEQRA review process.



## 8.0 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

### 8.1 Commitment of Resources

Similar to the 2013 FGEIS, it is anticipated that the expansion of the Park and subsequent development of the Park will require similar commitments of various types of community resources by OCIDA, Onondaga County, and other entities including the private sector as investment and development of the Park progresses.

The irreversible commitment of physical resources will include the conversion of approximately 4.0 million square feet of the expanded Park to building footprint and additional support facilities in support of potential industrial semiconductor uses. There will also be 50± acres of parking (which may include parking garages), loading areas, access and internal circulation roads at the expanded Park.


As evaluated in the 2013 FGEIS, the prime developable area of the Park generally consists of fields, shrubland, and some woodland areas. Residential properties may now be part of the prime developable area given the proposed expanded footprint of the Park along Burnet Road. Also similar to the 2013 FGEIS, areas that are likely to remain mainly undeveloped generally consist of wooded upland, wetlands and NYSDEC wetland buffer areas.


As analyzed in the 2013 FGEIS, development of the Park will require soil disturbance as well as the loss of vegetation and wildlife habitats. However, the goal will be to avoid wetlands and mature habitats to the maximum extent practicable by focusing development in the prime developable area (see Figure 1.1-2). Topsoil will be stockpiled for use on-site for landscaping, whenever possible. Trees removed for development will be considered for sale as timber and other vegetation cleared from the Project site will be recycled as mulch and landscaping, when practicable. The only difference from 2013 may be the amount of soil disturbance and trees impacts from development given the proposed expansion and greater Park acreage.


Development will include the commitment and consumption of building and construction materials including concrete, asphalt, steel, lumber, plastics and other raw materials and finished products. Development will require the consumption of water, electricity, fuel (gas and diesel), oil and other petroleum products. Additional materials and energy resources will be consumed by tenants for industrial processes. The provision of utilities for water, sewer, electrical, natural gas, and telecommunications will be required throughout construction and operation of facilities. The use of materials and goods are expected to be met by the region's supply. Nevertheless, as in 2013, this represents an irreversible and irretrievable commitment of these resources that will not be available for other uses.

The proposed Action will also require public and private services, including, but not limited to, solid waste disposal, police, fire and emergency services, as expected with any large-scale development and as detailed in the 2013 FGEIS. Commitment of these resources is an anticipated outcome of an industrial park's development.



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## 9.0 EFFECTS ON THE USE AND CONSERVATION OF ENERGY RESOURCES

### 9.1 Proposed Energy Sources

Commitment and indication of adequate capacity from National Grid to support the expanded Park with natural gas and electric utility service was received. The expanded Project site is capable of supporting a mix of industrial and/or commercial use facilities located in a campus-like setting. The facilities will consume natural gas and electricity as a result of normal operations.

It is anticipated that approximately 25 acres of the site could be used for a potential electrical substation and gas regulator station to support the energy needs of the expanded project site. This space has potential to be a central energy facility intended for energy distribution to the campus facilities and buildings, while minimizing the quantity of equipment needed and maximizing energy efficiency.

### 9.2 Anticipated Short-Term/Long-Term Energy Consumption

Based on the targeted semiconductor industry, development of the expanded Park may employ up to 4,000 employees and operate up to 4 million square feet of facilities. Potential facilities include the following use types:

- manufacturing/fabrication/assembly space
- laboratory, research and development (R&D) space
- logistics, warehousing, and/or shipping & receiving space
- office and administration space
- manufacturing support facilities, outdoor utility spaces, maintenance areas, waste facilities, and service/storage yards
- on-site energy generation or electrical substation space
- wastewater treatment systems or pump stations
- paved area for parking (which may include parking garages), loading, internal road circulation and/or shipping/receiving areas

Although the objective of the expanded Park is to develop the site for the semiconductor and manufacturing industry, the actual demand for energy can vary greatly according to the types of industries and businesses eventually located in the Park.

US Energy Information Administration's (EIA) 2018 Manufacturing Energy Consumption Survey identified that manufacturing facilities, on average, consume 95.1 kilowatt-hours (kWh) of electricity and 536,500 British thermal units (Btu) of natural gas per square foot annually. This average can increase or decrease significantly depending on the facility use type, manufactured product, and manufacturing process.





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### 9.3 Energy Codes and Executive Orders

Buildings and uses designed for the expanded Park will be constructed utilizing equipment and systems in compliance with energy conservation and building code standards as set forth by New York State Construction Codes. New York State has several codes and NYS programs related to their building energy code. These include the State Energy Conservation Construction Code (“SECCC”), the NYS Executive Order No. 111, and The New York Energy Smart Program.

The SECCC determines the minimum energy conservation requirements for new buildings including heating and ventilating, lighting, water heating, and power usage for appliances and building systems. Specific design requirements are related to the climate zone the building is located (Onondaga County, Zone 5A). Low energy and equipment buildings are exempt from the building thermal envelope provisions.

The NYS Executive Order No. 111 provides the guidelines for energy use and environmental issues for New York State buildings and vehicles. While this Executive Order would not apply to Private Industry, it represents an Energy Conservation Model recognized within the state that can be referenced by private industry. Some of the goals are to increase the availability of renewable energy sources and premium efficiency products, reducing peak summer energy demand and creating a less oil dependent economy. For new construction equal to or greater than 20,000 gross square feet, the building must achieve at least a 20% improvement in energy efficiency performance, meet the criteria for a U.S. Green Building Council Leadership in Energy and Environmental Design (“LEED”) rating, and comply with the New York State Green Building Tax Credit requirements.

### 9.4 State and Local Energy Initiatives

The following incentives are available to industry within NYS with a clear intent to promote and reward the use of energy efficient systems and policies. Several are available to industry located within Onondaga County and are promoted and coordinated by OCIDA. It is in the best interest of any industry locating at the expanded Park to be as energy efficient as possible to control operating costs as well as contribute to achievement of NYS initiatives and energy objectives. New facilities systems are expected to be designed to be highly energy efficient using the latest technologies in energy use and conservation which represent the most cost effective and responsible approach for the industry.

OCIDA coordinates incentive packages for businesses through the New York State Energy Research and Development Authority (“NYSERDA”) commercial/industrial programs. These programs provide energy efficiency services for new construction, industrial facilities and vehicle fleets. NYSERDA services include new renewable, clean energy and energy efficient product manufacturing incentives and services designed to promote greater transportation, lighting and HVAC efficiencies.



## 9.5 Energy Star and Industry Energy Responsibility Partnerships

Energy Star is a voluntary partnership program of the U.S. Environmental Protection Agency (“EPA”). Its primary purpose is to help U.S. industry improve its competitiveness through increased energy efficiency and reduced environmental impact. Through Energy Star, the U.S. EPA encourages strong and strategic corporate energy management programs and provides energy management tools and strategies to assist companies implement such programs. There are several methods for designers, contractors, and building managers to be recognized by the EPA. The most notable is the Energy Star Building Certification which requires the building to meet strict energy performance standards set by EPA. These standards include energy performance indicators (“EPIs”) to calculate energy intensity and to score the facility on a 1-100 scale. A score of 75 or above is required for certification, but certification is not available for all building types and for all sectors of industry. For a building in the design phase, there is the Designed to Earn Energy Star Recognition, which signifies that the operating energy use of the building is designed to be in the top 25 percent as compared to similar buildings throughout the U.S. Industrial and manufacturing facilities that are not part of EPA’s Industries of Focus are eligible to participate and receive Energy Star’s Challenge for Industry Recognition which is designed to help energy managers and industrial sites improve energy performance and set goals. Industrial sites participate by committing to the pre-established goal of improving energy performance by 10 percent within 5 years or less.

Currently, semiconductor manufacturing, including, but not limited to wafer fabrication and processing, is not eligible for an Energy Star Building Certification, but can be recognized through both the Designed to Earn Energy Star Recognition and Challenge for Industry Recognition. These programs offer advanced tools to assist manufacturers in assessing and tracking energy use and prescribing energy management and improvement initiatives with goals of energy reduction. Achievement of set energy reduction and environmental improvement goals results in receiving recognition.

Unstable energy markets, increasing competition, and global regulation of greenhouse gas emissions are currently causing many U.S. manufacturers to implement energy management as a viable opportunity. A reduction in production cost can be achieved without negatively affecting the yield and quality of products by effectively reducing energy consumption and costs. This goal can often be met through investments in energy efficiency, which can include the implementation of plant-wide energy-efficiency practices and the purchase of energy-efficient technologies. These technologies can often offer additional benefits, such as quality improvement, increased production, and increased process efficiency.

## 9.6 LEED Design and Construction

OCIDA promotes State and Federal incentives to encourage users to develop the Park with energy systems that are both energy efficient and environmentally friendly. This can be accomplished through the planning, design and construction of facilities that are consistent with Leadership in Energy and Environmental Design (LEED) certification standards. Standards include energy efficient heating, ventilation and air conditioning (HVAC) systems, and day-lighting of interior spaces.





## 10.0 SOLID WASTE MANAGEMENT ←

### 10.1 Solid Waste

The proposed expanded Park may employ up to 4,000 employees and operate up to 4 million square feet of facilities. As a result of the proposed Park expansion, there will be increased generation of solid and hazardous wastes, which represents a change from what was considered in the 2013 FGEIS.

Statistics vary greatly on the amount and type of waste that is generated by industrial processes depending on types of industrial uses and materials. Based on a California study<sup>1</sup> that was cited in the 2013 FGEIS, an estimated solid waste generation rate for typical manufacturing and warehousing facilities is 1.42 pounds per 100 square feet per day. Using this rate and the potential for approximately 4 million square feet of manufacturing and warehouse space at the expanded Park, approximately 56,800 pounds per day (28.4 tons per day) of solid waste could be generated. For perspective, a waste hauler truck that services businesses can fit up to 40 cubic yards of compacted waste or about 13.2 tons of waste. This would equate to about two truckloads per day of compacted solid waste leaving the Park. Given recent industry improvements in waste minimization, recycling, and reuse, it is anticipated that actual solid waste generation at the Project site would be less than 28.4 tons per day. According to a 2019 GLOBALFOUNDRIES Corporate Responsibility Report, their facilities generated an average of about 9-12 tons per day of solid waste over a five-year period (assuming five manufacturing plants).

Certain properties to be acquired along NYS Route 31 and Burnet Road contain existing structures and improvements that will ultimately be demolished and/or removed in furtherance of the future development of the expanded Park. Demolition activities will be conducted in accordance with Town of Clay requirements, including a demolition permit issued by the Town of Clay, and all debris will be disposed of at authorized off site facilities in accordance with applicable regulations. It is estimated that demolition of a 2000 square foot residential structure will generate about 100-120 tons of solid waste.

#### 10.1.1 Solid Waste Impacts and Mitigation

As described in the 2013 FGEIS, OCIDA will work with any future tenant to develop a solid waste management program that includes recycling and reuse of materials. Management and disposal of solid waste will be consistent with the goals established by the Onondaga County Resource Recovery Agency (OCRRA) in its September 2016 Solid Waste Management Plan Update. It is anticipated that the Town of Clay will incorporate solid waste management requirements (including reuse and recycling measures) into any zoning and land use approvals issued to a future tenant. These “best-management” practices are cost-effective alternatives to offsite disposal.

Transportation and disposal of non-hazardous solid waste will be coordinated with a licensed solid waste hauling firm. It is anticipated that material will primarily be taken to OCRRA’s Waste to Energy Facility

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<sup>1</sup> Santa Barbara County Public Works Department. Guide to Solid Waste and Recycling Plans for Development Projects (May 1997).





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in Jamesville or an approved transfer station. OCRRA also has contingency plans for disposal of waste, if necessary, at facilities such as Seneca Meadows Landfill (Seneca County) or High Acres Landfill (Monroe County). Future development and operations within the Park will also be required to comply with Chapter 194 of the Town of Clay Town Code concerning solid waste.

At the estimated solid waste generation rate, the potential impact is not anticipated to be significant in terms of the total service area and solid waste capacity. It is anticipated that local haulers will provide adequate services to the Park, as is currently being provided to other businesses and industrial users in the County. No additional mitigation is necessary since potential impacts due to solid waste generation are minimal.

## **10.2 Hazardous Materials**

Potential future industrial manufacturing activities at the Park could include the use and storage of petroleum, compressed specialty gases, and chemicals such as paints, solvents, chlorine, corrosive materials, and materials containing metals. Specialty gases that may be used or generated by a future tenant could include nitrogen, nitrogen trifluoride, oxygen, carbon dioxide, silane, nitrous oxide, helium, and argon.

Various types of hazardous waste may be produced as a result of the potential manufacturing and wastewater treatment activities that could take place at the proposed expanded Park. Hazardous waste could be in solid, liquid or gaseous forms and considered hazardous because of its physical characteristics or the process that generated the waste. Potential waste streams may include solvents, isopropyl alcohol, acids, hydrogen fluoride, ethylene glycol, chlorine, wastewater sludge, metal slurries, and metal plating wastes. The use, generation, treatment, handling and storage of hazardous waste will be monitored and regulated in accordance with applicable permits administered by NYSDEC and USEPA in accordance with the Resource Conservation and Recovery Act (RCRA), or other applicable State and Federal laws and regulations.

It is possible that up to approximately 60,000 tons of hazardous waste could be generated per year.

### **10.2.1 Hazardous Materials Impacts and Mitigation**

Off-site disposal of hazardous waste would be coordinated with a licensed hazardous waste hauler and one or more permitted treatment/disposal facilities. Permitted facilities in New York State that accept hazardous waste include Chemical Waste Management - Model City (Niagara County) and Durez Corporation (Niagara County). Alternatively, hazardous waste may be transported out-of-state using private vendors.

The use, generation, treatment, handling and storage of hazardous materials and generation of waste products has the potential to create a small to moderate impact if not handled properly and in accordance with State and Federal regulations. However, any such impacts will be mitigated through the use of engineering controls, staff training, best-management practices, and compliance with State/Federal permits, laws, and regulations.





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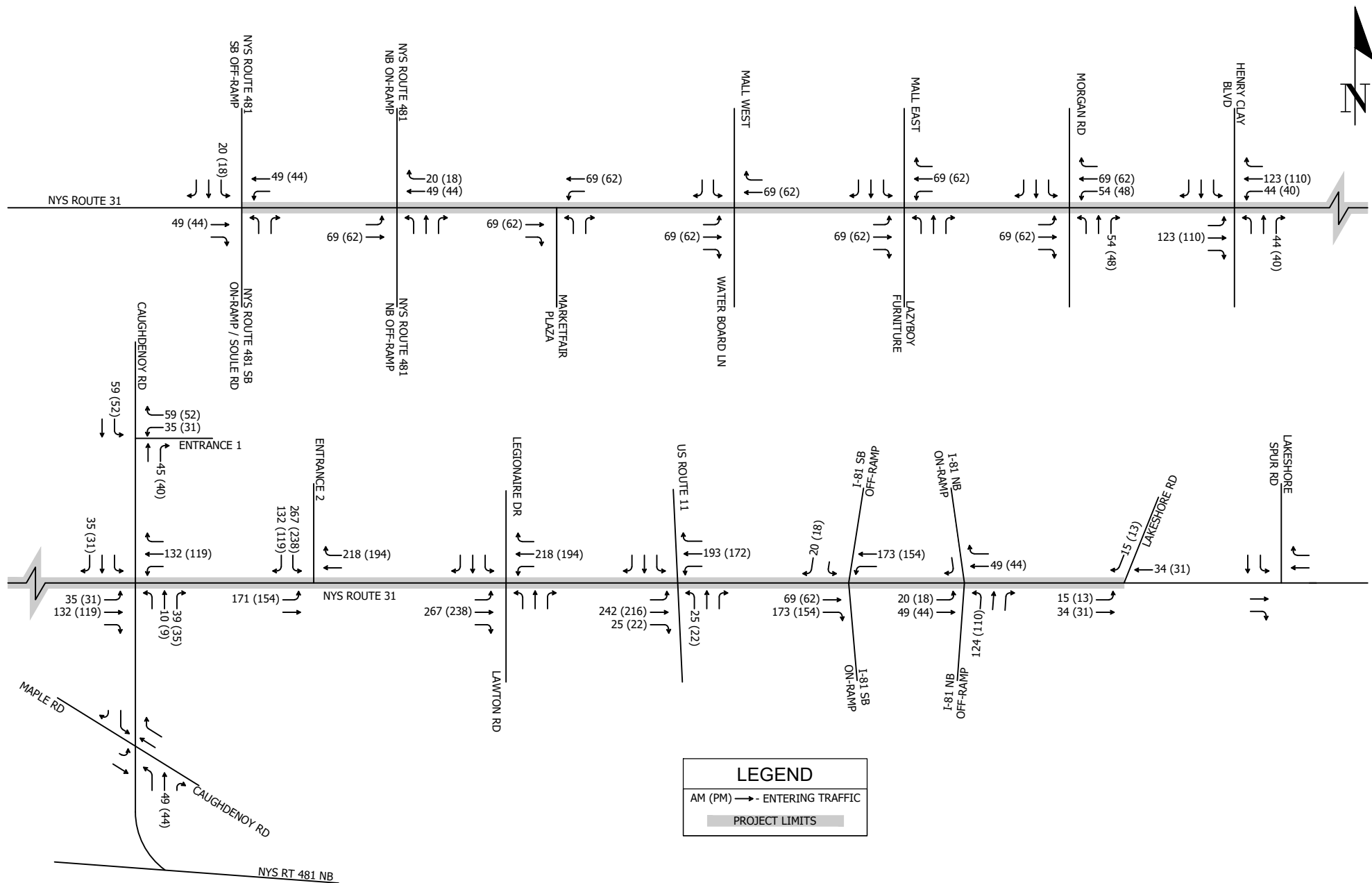
**Prepared for:**





## **APPENDIX D**

### **Revised Figure 9 and Synchro Tables**





 <p>19 British American Blvd. W, Latham NY 12110 P: 518-782-0882   F: 518-782-0973   jmt.com</p>		<p>WHITE PINE COMMERCE PARK ONONDAGA COUNTY INDUSTRIAL DEVELOPMENT AGENCY NEW TRIPS</p>	
<p>PROJ No.:20-03861</p>	<p>DATE: 4/22/2021</p>	<p>SCALE: N.T.S.</p>	<p>FIGURE: 9</p>



**Table 6. HCM AM Peak Hour Intersection Level of Service and Delay (s/veh) & V/C<sup>2</sup>**

Intersection	Approach	Movement	2021 Existing			2024 Background			2024 Background w/ Development			2024 Background, Development w/ Build			2044 Background, Development w/ Build		
			LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS <sup>1</sup>	Delay	V/C
NYS Route 31 & NYS Route 481 SB/Soule Rd	EB	T	C	20.7	0.37	C	22.0	0.41	C	22.7	0.46	C	22.7	0.46	C	28.7	0.63
		R	B	13.8	0.54	B	14.3	0.57	B	14.3	0.57	B	14.3	0.57	B	17.7	0.71
		Approach	B	16.6		B	17.4		B	17.9		B	17.9		C	22.3	
	WB	L	C	27.9	0.71	C	28.5	0.72	C	28.3	0.72	C	28.3	0.72	C	33.6	0.82
		T	A	5.9	0.32	A	6.5	0.35	A	7.9	0.38	A	7.9	0.38	A	9.5	0.48
		Approach	B	13.4		B	13.9		B	14.3		B	14.3		B	17.2	
	NB	L	C	28.9	0.29	C	28.0	0.30	C	27.9	0.29	C	27.9	0.29	C	24.6	0.27
		R	C	31.3	0.10	C	31.3	0.10	C	31.6	0.17	C	31.6	0.17	C	32.8	0.40
		Approach	C	30.4		C	30.0		C	30.2		C	30.2		C	29.6	
	SB	L	C	20.5	0.39	B	19.7	0.38	B	19.9	0.42	B	19.9	0.42	B	17.3	0.42
		T	C	33.9	0.24	C	34.0	0.24	C	34.0	0.24	C	34.0	0.24	C	34.1	0.28
		R	C	33.2	0.05	C	33.2	0.06	C	33.2	0.06	C	33.2	0.06	C	33.2	0.07
		Approach	C	25.0		C	24.5		C	24.4		C	24.4		C	22.7	
	Intersection Overall		B	18.0	0.61	B	18.4	0.64	B	18.7	0.64	B	18.7	0.64	C	21.3	0.77
NYS Route 31 & NYS Route 481 NB	EB	L	A	3.4	0.23	A	3.0	0.25	A	2.7	0.26	A	2.7	0.26	A	3.5	0.34
		T	A	2.9	0.27	A	2.7	0.28	A	2.5	0.31	A	2.5	0.31	A	2.7	0.36
		Approach	A	3.0		A	2.7		A	2.5		A	2.5		A	2.9	
	WB	T	A	6.0	0.28	A	6.2	0.29	A	6.4	0.32	A	6.4	0.32	A	7.1	0.38
		R	A	2.3	0.10	A	2.3	0.11	A	2.4	0.12	A	2.4	0.12	A	2.5	0.14
		Approach	A	5.2		A	5.4		A	5.5		A	5.5		A	6.1	
	NB	L	D	35.8	0.63	D	35.6	0.64	D	35.6	0.64	D	35.6	0.64	D	35.7	0.67
		LT	D	35.8	0.63	D	35.9	0.64	D	35.9	0.64	D	35.9	0.64	D	36.1	0.67
		R	C	29.0	0.03	C	28.7	0.03	C	28.7	0.03	C	28.7	0.03	C	27.7	0.04
		Approach	C	34.9		C	34.9		C	34.9		C	34.9		C	34.9	
	Intersection Overall		A	9.8	0.36	A	9.7	0.37	A	9.2	0.40	A	9.2	0.40	A	9.7	0.46
NYS Route 31 & Marketfair Plaza	EB	T	A	0.7	0.26	A	0.7	0.27	A	0.7	0.29	A	0.7	0.29	A	0.8	0.34
		R	A	0.0	0.02	A	0.0	0.02	A	0.0	0.02	A	0.0	0.02	A	0.0	0.02
		Approach	A	0.7		A	0.7		A	0.7		A	0.7		A	0.7	
	WB	L	A	0.7	0.01	A	0.7	0.01	A	0.8	0.01	A	0.8	0.01	A	1.0	0.02
		T	A	0.9	0.24	A	0.9	0.25	A	1.0	0.27	A	1.0	0.27	A	1.0	0.31
		Approach	A	0.9		A	0.9		A	1.0		A	1.0		A	1.0	
	NB	L	D	38.0	0.15	D	38.0	0.15	D	38.0	0.15	D	38.0	0.15	D	38.0	0.19
		R	D	35.7	0.00	D	35.7	0.00	D	35.7	0.00	D	35.7	0.00	D	35.6	0.00



# WHITE PINE COMMERCE PARK Traffic Impact Study

Intersection	Approach	Movement	2021 Existing			2024 Background			2024 Background w/ Development			2024 Background, Development w/ Build			2044 Background, Development w/ Build		
			LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS <sup>1</sup>	Delay	V/C
		Approach	D	37.6		D	37.6		D	37.6		D	37.6		D	37.7	
		Intersection Overall	A	1.1	0.26	A	1.1	0.27	A	1.1	0.30	A	1.1	0.30	A	1.2	0.34
NYS Route 31 & Mall West/ Water Board Lane	EB	L	D	46.5	0.22	D	46.2	0.22	D	46.1	0.22	D	46.1	0.22	D	43.5	0.21
		TR	A	0.5	0.23	A	0.5	0.24	A	0.5	0.26	A	0.5	0.26	A	0.5	0.30
		Approach	A	3.4		A	3.3		A	3.1		A	3.1		A	3.0	
	WB	L	A			A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00
		T	A	1.6	0.29	A	1.5	0.30	A	1.5	0.33	A	1.5	0.33	A	1.8	0.38
		R	A	2.4	0.01	A	2.4	0.01	A	2.4	0.01	A	2.4	0.01	A	2.7	0.01
		Approach	A	1.6		A	1.6		A	1.5		A	1.5		A	1.8	
	NB	LTR (Approach)	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00
	SB	LT	D	37.3	0.15	D	37.3	0.15	D	37.3	0.15	D	37.3	0.15	D	37.3	0.17
		R	C	32.8	0.08	C	32.8	0.08	C	32.8	0.08	C	32.8	0.08	C	31.7	0.08
		Approach	C	34.3		C	34.3		C	34.3		C	34.3		C	33.5	
	Intersection Overall		A	3.2	0.30	A	3.2	0.32	A	2.9	0.35	A	2.9	0.35	A	3.1	0.40
NYS Route 31 & Mall East/ Lazy B Furniture	EB	L	A	2.9	0.02	A	3.3	0.02	A	3.2	0.02	A	3.2	0.02	A	5.2	0.03
		TR	A	3.5	0.24	A	3.8	0.26	A	3.7	0.28	A	3.7	0.28	A	5.7	0.33
		Approach	A	3.5		A	3.8		A	3.6		A	3.6		A	5.7	
	WB	L	A	4.7	0.06	A	4.8	0.06	A	4.8	0.07	A	4.8	0.07	A	5.6	0.09
		TR	A	5.6	0.28	A	5.7	0.29	A	5.9	0.32	A	5.9	0.32	A	7.0	0.38
		Approach	A	5.6		A	5.7		A	5.9		A	5.9		A	6.9	
	NB	L	C	34.7	0.42	C	34.6	0.43	C	34.6	0.43	C	34.6	0.43	C	34.5	0.48
		TR	C	32.6	0.03	C	32.5	0.03	C	32.5	0.03	C	32.5	0.03	C	32.1	0.04
		Approach	C	33.7		C	33.6		C	33.6		C	33.6		C	33.4	
	SB	LT	C	32.6	0.02	C	32.5	0.01	C	32.5	0.01	C	32.5	0.01	C	32.0	0.01
		R	C	30.0	0.01	C	29.9	0.01	C	29.9	0.01	C	29.9	0.01	C	28.6	0.01
		Approach	C	30.2		C	30.1		C	30.1		C	30.1		C	28.9	
	Intersection Overall		A	7.2	0.30	A	7.3	0.32	A	7.1	0.34	A	7.1	0.34	A	8.5	0.40
NYS Route 31 & Morgan Road	EB	L	C	23.5	0.18	C	24.0	0.19	C	24.4	0.18	C	24.4	0.18	C	25.3	0.22
		T	C	28.5	0.48	C	29.3	0.50	C	31.8	0.56	C	31.8	0.56	C	34.2	0.62
		R	B	18.7	0.11	B	19.0	0.11	C	20.3	0.11	C	20.3	0.11	C	21.0	0.13
		Approach	C	25.0		C	25.6		C	28.0		C	28.0		C	29.7	
	WB	L	C	21.6	0.28	C	22.1	0.29	C	22.0	0.47	C	22.0	0.47	C	24.2	0.55
		TR	C	26.1	0.41	C	26.8	0.41	C	27.8	0.45	C	27.8	0.45	C	29.7	0.50





# WHITE PINE COMMERCE PARK Traffic Impact Study

Intersection	Approach	Movement	2021 Existing			2024 Background			2024 Background w/ Development			2024 Background, Development w/ Build			2044 Background, Development w/ Build		
			LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS <sup>1</sup>	Delay	V/C
	NB	Approach	C	25.3		C	25.9		C	26.4		C	26.4		C	28.4	
		L	B	18.9	0.44	B	19.0	0.46	C	21.5	0.50	C	21.5	0.50	C	24.3	0.66
		T	C	22.6	0.12	C	22.6	0.12	C	25.0	0.13	C	25.0	0.13	C	21.0	0.12
		R	B	18.4	0.04	B	18.4	0.04	B	19.2	0.07	B	19.2	0.07	B	15.8	0.08
		Approach	B	19.7		B	19.7		C	21.3		C	21.3		C	20.8	
	SB	L	B	12.5	0.11	B	12.5	0.12	B	14.5	0.12	B	14.5	0.12	B	19.3	0.16
		TR	C	28.9	0.69	C	29.4	0.70	C	32.9	0.71	C	32.9	0.71	D	40.9	0.82
		Approach	C	26.3		C	26.8		C	30.0		C	30.0		D	37.6	
	Intersection Overall		C	24.6	0.55	C	25.1	0.57	C	27.0	0.61	C	27.0	0.61	C	29.8	0.71
NYS Route 31 & Henry Clay Blvd	EB	L	B	11.9	0.01	B	12.1	0.02	B	12.6	0.02	B	10.1	0.02	B	10.7	0.02
		TR	B	18.6	0.58	B	19.2	0.60	C	23.3	0.70	B	18.6	0.67	C	21.9	0.73
		Approach	B	18.5		B	19.1		C	23.2		B	18.5		C	21.8	
	WB	L	A	8.2	0.30	A	8.6	0.31	B	12.0	0.49	A	9.0	0.44	B	12.9	0.56
		TR	B	11.3	0.36	B	11.6	0.37	B	13.2	0.47	B	10.3	0.45	B	11.5	0.49
		Approach	B	10.4		B	10.8		B	12.9		A	10.0		B	11.9	
	NB	L	-	-	-	-	-	-	-	-	-	D	36.4	0.60	D	50.6	0.74
		TR	-	-	-	-	-	-	-	-	-	C	29.4	0.20	C	32.4	0.25
		Approach	C	31.8	0.65	C	33.8	0.68	D	46.8	0.79	C	32.4	0.78	D	40.3	0.90
	SB	LTR (Approach)	C	25.8	0.40	C	26.5	0.40	C	30.9	0.39	C	32.1	0.51	D	36.0	0.55
NYS Route 31 & Caughdenoy Road	Intersection Overall		B	18.5	0.57	B	19.3	0.59	C	23.5	0.71	B	18.6	0.63	C	22.2	0.72
	EB	LTR (Approach)	A	4.5	0.37	A	4.5	0.38	A	6.5	0.57	A	6.5	0.57	A	7.0	0.62
	WB	LTR (Approach)	A	4.3	0.34	A	4.3	0.35	A	5.5	0.47	A	5.5	0.47	A	5.7	0.51
	NB	LTR (Approach)	B	15.4	0.31	B	15.7	0.31	B	16.6	0.31	B	16.6	0.31	B	18.0	0.35
	SB	LTR (Approach)	B	16.0	0.37	B	16.2	0.38	B	16.5	0.30	B	16.5	0.30	B	18.1	0.36
NYS Route 31 & Legionnaire Dr/ Lawton Rd	Intersection Overall		A	6.5	0.37	A	6.5	0.38	A	8.1	0.51	A	8.1	0.51	A	8.7	0.56
	EB	L	A	5.5	0.01	A	5.5	0.01	A	4.6	0.01	A	4.6	0.01	A	5.1	0.01
		TR	A	9.8	0.59	A	9.9	0.60	B	12.4	0.75	B	12.4	0.75	B	16.0	0.82
		Approach	A	9.8		A	9.9		B	12.4		B	12.4		B	16.0	
	WB	L	A	5.0	0.09	A	5.1	0.10	A	6.9	0.13	A	6.9	0.13	B	10.3	0.18
		TR	A	6.5	0.30	A	6.5	0.31	A	6.2	0.45	A	6.2	0.45	A	7.0	0.48
		Approach	A	6.3		A	6.4		A	6.3		A	6.3		A	7.2	
	NB	L	C	22.4	0.17	C	22.6	0.17	C	32.3	0.22	C	32.3	0.22	D	35.4	0.22
		TR	C	21.8	0.07	C	22.0	0.07	C	31.2	0.07	C	31.2	0.07	C	34.3	0.08



# WHITE PINE COMMERCE PARK Traffic Impact Study

Intersection	Approach	Movement	2021 Existing			2024 Background			2024 Background w/ Development			2024 Background, Development w/ Build			2044 Background, Development w/ Build		
			LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS <sup>1</sup>	Delay	V/C
	SB	Approach	C	21.9		C	22.1		C	31.5		C	31.5		C	34.6	
		L	C	23.7	0.34	C	23.9	0.35	C	34.6	0.44	C	34.6	0.44	D	37.6	0.43
		TR	C	21.7	0.05	C	21.8	0.05	C	31.1	0.06	C	31.1	0.06	C	34.2	0.06
		Approach	C	23.2		C	23.4		C	33.8		C	33.8		D	36.8	
	Intersection Overall		B	10.9	0.52	B	11.0	0.53	B	12.6	0.67	B	12.6	0.67	B	15.3	0.73
NYS Route 31 & US Route 11	EB	L	A	9.3	0.07	A	9.6	0.07	A	9.4	0.08	D	53.0	0.49	D	51.5	0.46
		TR	B	13.5	0.37	B	13.9	0.38	B	15.7	0.52	B	15.4	0.52	C	20.4	0.63
		Approach	B	13.3		B	13.7		B	15.5		B	16.7		C	21.6	
	WB	L	A	5.9	0.46	A	6.2	0.47	A	8.4	0.57	D	42.3	0.58	D	43.6	0.62
		TR	A	4.9	0.19	A	4.9	0.20	A	5.9	0.28	A	7.0	0.30	A	8.7	0.36
		Approach	A	5.3		A	5.3		A	6.6		B	17.0		B	18.9	
	NB	L	D	45.9	0.12	D	45.9	0.12	D	46.6	0.31	D	46.2	0.30	D	45.2	0.29
		T	D	48.1	0.19	D	48.2	0.20	D	49.5	0.27	D	49.5	0.27	D	49.7	0.30
		R	D	42.7	0.59	D	42.2	0.58	D	41.9	0.58	D	43.4	0.60	D	44.8	0.66
		Approach	D	43.6		D	43.2		D	43.6		D	44.6		D	45.5	
	SB	L	D	39.2	0.43	D	39.3	0.44	D	41.8	0.49	D	41.4	0.47	D	37.0	0.42
		TR	D	43.3	0.15	D	43.3	0.15	D	46.1	0.21	D	46.1	0.21	D	43.5	0.19
		Approach	D	41.1		D	41.2		D	43.9		D	43.7		D	40.2	
	Intersection Overall		B	16.5	0.49	B	16.7	0.51	B	17.3	0.58	C	21.8	0.54	C	24.6	0.61
NYS Route 31 & I-81 SB Ramps	EB	TR (Approach)	D	43.3	0.87	D	44.2	0.89	F	89.6	1.10	C	25.2	0.84	C	32.2	0.94
	WB	L	C	28.0	0.93	C	32.5	0.96	C	34.9	0.97	B	14.8	0.66	B	17.2	0.81
		T	A	3.1	0.20	A	3.1	0.21	A	2.2	0.27	A	2.4	0.29	A	2.5	0.33
		Approach	B	17.4		C	20.1		B	18.9		A	8.8		B	10.1	
	SB	LT	E	74.0	0.81	E	77.4	0.83	E	77.4	0.83	D	54.6	0.68	D	54.5	0.70
		R	D	46.1	0.09	D	46.1	0.09	D	46.2	0.10	D	44.2	0.10	D	43.1	0.12
		Approach	E	59.7		E	61.4		E	60.3		D	49.0		D	48.3	
	Intersection Overall		C	31.5	0.95	C	33.4	0.98	D	51.3	1.00	B	19.2	0.74	C	22.5	0.86
NYS Route 31 & I-81 NB Ramps /Pardee Road	EB	L	A	4.1	0.21	A	4.1	0.21	C	22.6	0.31	A	7.2	0.31	A	8.9	0.39
		T	A	1.3	0.19	A	1.4	0.20	A	7.3	0.24	A	2.9	0.24	A	3.1	0.28
		Approach	A	1.8		A	1.8		A	10.0		A	3.6		A	4.1	
	WB	TR (Approach)	B	19.1	0.61	B	19.5	0.63	C	24.1	0.71	B	19.6	0.65	C	25.4	0.79
	NB	L	D	45.8	0.55	D	45.9	0.56	D	51.0	0.78	D	40.2	0.45	D	39.4	0.46
		T	D	41.8	0.17	D	41.7	0.17	D	35.3	0.12	D	37.7	0.13	D	36.8	0.14



Intersection	Approach	Movement	2021 Existing			2024 Background			2024 Background w/ Development			2024 Background, Development w/ Build			2044 Background, Development w/ Build		
			LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS <sup>1</sup>	Delay	V/C
		R	D	42.3	0.23	D	42.1	0.24	D	36.3	0.24	D	47.3	0.73	D	50.9	0.80
		Approach	D	43.1		D	43.1		D	42.3		D	43.9		D	45.6	
	SB	R (Approach)	D	39.8	0.54	D	40.2	0.55	D	45.4	0.63	D	51.7	0.71	D	53.4	0.76
	Intersection Overall		C	20.9	0.59	C	21.2	0.60	C	26.0	0.71	C	23.1	0.68	C	26.3	0.78
NYS Route 31 & Lakeshore Road (unsignalized) <sup>7</sup>	EB	L	A	2.0	0.19	B	10.2	0.20	B	10.6	0.23	B	10.6	0.23	B	12.1	0.30
	SB	R	F	252.8	1.48	F	284.2	1.55	F	350.4	1.70	F	350.4	1.70	F	656.2	2.38
	Intersection Overall		F	252.8	1.48	F	284.2	1.55	F	350.4	1.70	F	350.4	1.70	F	656.2	2.38
Caughdenoy Road/ Maple Rd & NYS Route 481 Off Ramp (unsignalized) <sup>7</sup>	EB	LT	A	0.2	0.00	A	0.2	0.00	A	0.2	0.00	A	0.2	0.00	A	0.3	0.00
	NB	LR	A	9.4	0.05	A	9.4	0.05	A	10.0	0.12	A	10.0	0.12	B	10.2	0.13
	SB	LTR	B	10.6	0.18	B	10.7	0.19	B	11.4	0.20	B	11.4	0.20	B	12.2	0.24
	Intersection Overall		B	10.6	0.18	B	10.7	0.19	B	11.4	0.20	B	11.4	0.20	B	12.2	0.24
Caughdenoy Road & Entrance 1 (unsignalized) <sup>1</sup>	WB	L	-	-	-	-	-	-	B	10.5	0.05	B	10.5	0.05	B	10.7	0.06
		R	-	-	-	-	-	-	A	8.8	0.06	A	8.8	0.06	A	8.9	0.06
		Approach	-	-	-	-	-	-	A	9.5		A	9.5		A	9.6	
	SB	L	-	-	-	-	-	-	A	7.6	0.04	A	7.6	0.04	A	7.6	0.04
	Intersection Overall		-	-	-	-	-	-	A	9.5		A	9.5		B	10.7	
NYS Route 31 & Entrance 2	EB	L	-	-	-	-	-	-	B	10.4	0.48	B	10.4	0.48	B	10.9	0.52
		T	-	-	-	-	-	-	B	11.4	0.61	B	11.4	0.61	B	12.3	0.66
		Approach	-	-	-	-	-	-	B	11.1		B	11.1		B	11.9	
	WB	T	-	-	-	-	-	-	A	9.8	0.48	A	9.8	0.48	B	10.2	0.52
		R	-	-	-	-	-	-	A	8.1	0.16	A	8.1	0.16	A	8.0	0.16
		Approach	-	-	-	-	-	-	A	9.2		A	9.2		A	9.5	
	SB	L	-	-	-	-	-	-	B	14.3	0.56	B	14.3	0.56	B	16.0	0.57
		R	-	-	-	-	-	-	B	11.2	0.09	B	11.2	0.09	B	12.5	0.09
		Approach	-	-	-	-	-	-	B	13.3		B	13.3		B	14.9	
	Intersection Overall		-	-	-	-	-	-	B	10.9	0.58	B	10.9	0.58	B	11.7	0.62



**Table 7. HCM PM Peak Hour Intersection Level of Service and Delay (s/veh)**

Intersection	Approach	Movement	2021 Existing			2024 Background			2024 Background w/ Development			2024 Background, Development w/ Build			2044 Background, Development w/ Build		
			LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C
NYS Route 31 & NYS Route 481 SB/Soule Rd	EB	T	C	33.7	0.76	D	35.1	0.79	D	36.9	0.83	D	36.9	0.83	D	51.9	0.97
		R	C	20.5	0.67	C	21.4	0.70	C	21.4	0.70	C	21.4	0.70	C	28.9	0.84
		Approach	C	28.2		C	29.4		C	30.6		C	30.6		D	42.5	
	WB	L	C	30.4	0.86	C	30.4	0.88	C	29.2	0.88	C	29.2	0.88	D	35.3	1.00
		T	A	6.4	0.72	A	6.4	0.74	A	6.8	0.77	A	6.8	0.77	A	7.3	0.88
		Approach	B	12.9		B	12.9		B	12.7		B	12.7		B	14.7	
	NB	L	D	51.3	0.78	D	53.3	0.80	D	53.3	0.80	D	53.3	0.80	E	73.4	0.93
		R	D	35.3	0.29	D	35.4	0.31	D	35.4	0.31	D	35.4	0.31	D	35.7	0.39
		Approach	D	44.8		D	46.0	0.33	D	46.0		D	46.0		E	58.1	
	SB	L	C	26.5	0.32	C	26.4		C	26.7	0.36	C	26.7	0.36	C	27.3	0.42
		T	D	43.8	0.44	D	43.9	0.45	D	43.9	0.45	D	43.9	0.45	D	44.5	0.51
		R	D	42.0	0.11	D	42.0	0.12	D	42.0	0.12	D	42.0	0.12	D	42.1	0.13
		Approach	D	35.8		D	35.8		D	35.6		D	35.6		D	36.0	
	Intersection Overall		C	23.5	0.77	C	24.0	0.79	C	24.4	0.80	C	24.4	0.80	C	30.6	0.93
NYS Route 31 & NYS Route 481 NB	EB	L	B	19.5	0.79	C	24.4	0.83	C	26.2	0.85	C	26.2	0.85	D	50.6	0.99
		T	B	11.9	0.54	B	12.4	0.56	B	12.6	0.60	B	12.6	0.60	B	17.1	0.73
		Approach	B	13.2		B	14.4		B	14.8		B	14.8		C	22.6	
	WB	T	C	24.1	0.72	C	25.6	0.75	C	24.5	0.79	C	24.5	0.79	D	49.4	1.00
		R	B	19.0	0.17	B	19.8	0.17	B	15.3	0.18	B	15.3	0.18	C	26.1	0.21
		Approach	C	23.0		C	24.4		C	22.5		C	22.5		D	44.4	
	NB	L	D	46.9	0.91	D	48.0	0.91	D	48.0	0.91	D	48.0	0.91	E	57.3	0.97
		LT	D	47.1	0.91	D	48.0	0.91	D	48.0	0.91	D	48.0	0.91	E	57.6	0.97
		R	C	23.8	0.38	C	23.5	0.38	C	23.5	0.38	C	23.5	0.38	C	21.9	0.42
		Approach	D	42.4		D	43.1		D	43.1		D	43.1		D	50.4	
	Intersection Overall		C	26.7	0.85	C	27.8	0.88	C	27.0	0.90	C	27.0	0.90	D	39.3	1.00
NYS Route 31 & Marketfair Plaza	EB	T	A	2.7	0.49	A	2.9	0.50	A	3.4	0.53	A	3.4	0.53	A	3.9	0.62
		R	A	0.3	0.07	A	0.8	0.07	A	0.8	0.07	A	0.8	0.07	A	0.3	0.08
		Approach	A	2.5		A	2.7		A	3.2		A	3.2		A	3.6	
	WB	L	A	4.0	0.13	A	4.2	0.14	A	5.8	0.15	A	5.8	0.15	A	6.9	0.22
		T	A	2.5	0.40	A	2.6	0.41	A	3.2	0.43	A	3.2	0.43	A	3.3	0.51
		Approach	A	2.6		A	2.6		A	3.3		A	3.3		A	3.5	
	NB	L	D	50.0	0.65	D	50.1	0.66	D	50.1	0.66	D	50.1	0.66	D	50.7	0.69
		R	D	37.4	0.02	D	37.3	0.02	D	37.3	0.04	D	37.3	0.04	D	36.3	0.11



Intersection	Approach	Movement	2021 Existing			2024 Background			2024 Background w/ Development			2024 Background, Development w/ Build			2024 Background, Development w/ Build		
			LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C
NYS Route 31 & Mall West/ Water Board Lane		Approach	D	46.0		D	46.0		D	46.1		D	46.1		D	46.2	
		Intersection Overall	A	5.2	0.51	A	5.3	0.53	A	5.8	0.55	A	5.8	0.55	A	6.1	0.64
	EB	L	D	48.7	0.59	D	48.4	0.60	D	47.6	0.60	D	47.6	0.60	D	44.7	0.64
		TR	A	0.7	0.39	A	0.7	0.40	A	2.0	0.42	A	2.0	0.42	A	3.8	0.49
		Approach	B	10.9		B	10.7		B	11.2		B	11.2		B	12.1	
	WB	L	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00
		T	A	9.8	0.48	A	10.0	0.49	B	10.3	0.52	B	10.3	0.52	B	11.8	0.62
		R	A	1.1	0.03	A	1.1	0.03	A	0.8	0.03	A	0.8	0.03	A	1.1	0.04
		Approach	A	9.4		A	9.5		A	9.9		A	9.9		B	11.4	
	NB	LTR (Approach)	D	48.4	0.03	D	48.4	0.03	D	48.4	0.03	D	48.4	0.03	D	48.4	0.03
	SB	LT	D	45.0	0.35	D	45.0	0.36	D	45.0	0.36	D	45.0	0.36	D	45.0	0.40
		R	C	35.0	0.43	C	34.9	0.43	C	34.9	0.43	C	34.9	0.43	C	34.1	0.47
		Approach	D	36.5		D	36.5		D	36.5		D	36.5		D	35.8	
	Intersection Overall		B	13.2	0.48	B	13.1	0.49	B	13.3	0.52	B	13.3	0.52	B	14.3	0.59
NYS Route 31 & Mall East/ Lazy B Furniture	EB	L	A	0.7	0.09	A	0.8	0.10	A	0.6	0.11	A	0.6	0.11	A	0.8	0.15
		TR	A	0.9	0.36	A	1.0	0.37	A	0.9	0.40	A	0.9	0.40	A	1.1	0.46
		Approach	A	0.9		A	1.0		A	0.9		A	0.9		A	1.1	
	WB	L	A	4.3	0.04	A	4.3	0.04	A	4.4	0.05	A	4.4	0.05	A	4.8	0.07
		TR	A	5.9	0.38	A	6.0	0.40	A	6.2	0.42	A	6.2	0.42	A	7.0	0.49
		Approach	A	5.9		A	6.0		A	6.2		A	6.2		A	7.0	
	NB	L	D	44.9	0.38	D	44.8	0.38	D	44.8	0.38	D	44.8	0.38	D	44.8	0.42
		TR	D	43.0	0.04	D	42.9	0.04	D	42.9	0.04	D	42.9	0.04	D	42.5	0.05
		Approach	D	44.1		D	44.0		D	44.0		D	44.0		D	43.8	
	SB	LT	D	44.6	0.33	D	44.5	0.34	D	44.5	0.34	D	44.5	0.34	D	44.3	0.36
		R	D	38.3	0.03	D	38.3	0.03	D	38.3	0.04	D	38.3	0.04	D	37.9	0.03
		Approach	D	40.5		D	40.4		D	40.4		D	40.4		D	40.0	
	Intersection Overall		A	6.2	0.39	A	6.2	0.40	A	6.1	0.43	A	6.1	0.43	A	6.6	0.49
NYS Route 31 & Morgan Road	EB	L	C	26.4	0.76	C	30.4	0.80	C	34.7	0.82	C	34.7	0.82	D	51.9	0.91
		T	C	24.2	0.39	C	25.9	0.43	C	28.1	0.50	C	28.1	0.50	C	29.5	0.55
		R	B	13.5	0.16	B	14.5	0.17	B	14.9	0.17	B	14.9	0.17	B	14.7	0.19
		Approach	C	21.8		C	23.9		C	26.3		C	26.3		C	31.2	
	WB	L	C	23.9	0.31	C	23.4	0.30	C	24.3	0.46	C	24.3	0.46	C	26.6	0.54
		TR	C	32.7	0.66	C	34.5	0.70	D	38.9	0.79	D	38.9	0.79	D	49.4	0.90
		Approach	C	31.5		C	32.9		D	36.3		D	36.3		D	45.5	



Intersection	Approach	Movement	2021 Existing			2024 Background			2024 Background w/ Development			2024 Background, Development w/ Build			2044 Background, Development w/ Build		
			LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C
	NB	L	C	25.1	0.70	C	25.2	0.72	C	25.0	0.70	C	25.0	0.70	D	41.3	0.87
		T	C	25.7	0.36	C	25.3	0.36	C	25.1	0.35	C	25.1	0.35	C	28.1	0.42
		R	B	19.2	0.05	B	17.9	0.05	B	17.1	0.08	B	17.1	0.08	B	18.9	0.09
		Approach	C	24.5		C	24.3		C	23.5		C	23.5		C	32.7	
	SB	L	C	26.6	0.12	C	26.3	0.12	C	28.0	0.13	C	28.0	0.13	C	30.0	0.15
		TR	C	34.4	0.49	C	34.2	0.51	D	35.9	0.52	D	35.9	0.52	D	43.1	0.66
		Approach	C	33.2		C	33.0		C	34.6		C	34.6		D	41.1	
	Intersection Overall		C	26.2	0.79	C	27.4	0.82	C	29.4	0.82	C	29.4	0.82	D	36.6	0.95
NYS Route 31 & Henry Clay Blvd	EB	L	B	17.2	0.08	B	17.7	0.09	C	20.2	0.12	B	11.0	0.08	B	12.6	0.10
		TR	C	32.6	0.77	C	34.0	0.79	D	46.0	0.90	C	23.3	0.76	C	27.9	0.83
		Approach	C	31.9		C	33.3		D	45.0		C	22.9		C	27.3	
	WB	L	B	18.1	0.34	B	18.8	0.36	D	39.6	0.76	B	12.9	0.42	B	19.3	0.59
		TR	C	24.5	0.59	C	25.2	0.60	C	30.2	0.71	B	16.4	0.59	B	18.7	0.65
		Approach	C	23.5		C	24.2		C	31.8		B	15.8		B	18.8	
	NB	L	-	-	-	-	-	-	-	-	-	D	36.6	0.66	D	40.7	0.68
		TR	-	-	-	-	-	-	-	-	-	D	39.6	0.74	D	50.1	0.83
		Approach	D	43.8	0.87	D	46.3	0.89	E	60.5	0.95	D	38.5		D	46.5	
	SB	LTR (Approach)	C	20.8	0.08	C	21.2	0.08	C	23.5	0.08	C	27.9	0.13	C	31.3	0.18
	Intersection Overall		C	32.3	0.79	C	33.8	0.81	D	43.9	0.91	C	24.7	0.73	C	29.7	0.81
NYS Route 31 & Caughdenoy Road	EB	LTR (Approach)	A	4.7	0.48	A	4.8	0.49	A	7.8	0.67	A	7.8	0.67	A	9.6	0.74
	WB	LTR (Approach)	A	4.6	0.45	A	4.6	0.46	A	6.2	0.57	A	6.2	0.57	A	7.1	0.64
	NB	LTR (Approach)	B	18.6	0.43	B	18.8	0.44	B	19.8	0.44	B	19.8	0.44	C	22.1	0.52
	SB	LTR (Approach)	B	17.1	0.21	B	17.2	0.20	B	18.1	0.18	B	18.1	0.18	B	19.5	0.21
	Intersection Overall		A	6.4	0.47	A	6.4	0.48	A	8.8	0.62	A	8.8	0.62	B	10.2	0.70
NYS Route 31 & Legionnaire Dr/ Lawton Rd	EB	L	A	8.4	0.02	A	8.5	0.02	A	7.6	0.02	A	7.6	0.02	A	8.2	0.03
		TR	B	13.0	0.55	B	13.3	0.56	B	15.9	0.72	B	15.9	0.72	B	18.5	0.77
		Approach	B	13.0		B	13.2		B	15.8		B	15.8		B	18.4	
	WB	L	A	4.6	0.27	A	4.7	0.28	A	7.8	0.37	A	7.8	0.37	B	10.9	0.48
		TR	A	7.9	0.49	A	8.0	0.50	A	8.8	0.62	A	8.8	0.62	B	10.2	0.68
		Approach	A	7.2		A	7.3		A	8.7		A	8.7		B	10.3	
	NB	L	C	25.4	0.21	C	25.6	0.22	C	33.0	0.24	C	33.0	0.24	D	35.8	0.26
		TR	C	24.4	0.06	C	24.6	0.06	C	31.7	0.06	C	31.7	0.06	C	34.3	0.07
		Approach	C	24.8		C	24.9		C	32.1		C	32.1		C	34.8	
	SB	L	C	30.2	0.56	C	30.8	0.57	D	41.6	0.63	D	41.6	0.63	D	51.7	0.72



# WHITE PINE COMMERCE PARK Traffic Impact Study

Intersection	Approach	Movement	2021 Existing			2024 Background			2024 Background w/ Development			2024 Background, Development w/ Build			2044 Background, Development w/ Build		
			LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C
		TR	C	24.8	0.13	C	25.0	0.14	C	32.2	0.15	C	32.2	0.15	C	34.9	0.17
		Approach	C	28.3		C	28.7		D	38.2		D	38.2		D	45.5	
		Intersection Overall	B	12.6	0.53	B	12.8	0.54	B	15.1	0.68	B	15.1	0.68	B	17.7	0.75
NYS Route 31 & US Route 11	EB	L	C	24.0	0.16	C	24.7	0.17	C	23.8	0.18	D	51.0	0.45	D	53.4	0.54
		TR	C	32.6	0.51	C	33.9	0.53	D	38.2	0.74	C	31.4	0.64	D	38.2	0.78
		Approach	C	31.9		C	33.2		D	37.4		C	32.5		D	39.1	
	WB	L	C	24.4	0.73	C	25.5	0.75	D	41.6	0.86	D	42.7	0.71	D	47.3	0.81
		TR	B	13.9	0.39	B	14.5	0.40	B	14.4	0.49	B	14.5	0.54	B	16.4	0.65
		Approach	B	17.9		B	18.7		C	23.3		C	23.7		C	26.7	
	NB	L	C	31.4	0.33	C	31.2	0.33	C	32.9	0.52	C	31.5	0.48	C	29.6	0.51
		T	D	45.8	0.72	D	45.6	0.73	D	45.8	0.73	D	45.8	0.73	D	46.9	0.78
		R	C	29.0	0.74	C	28.3	0.74	C	28.0	0.74	D	42.4	0.86	D	52.5	0.94
		Approach	C	34.5		C	34.1		C	34.1		D	41.8		D	47.5	
	SB	L	D	40.3	0.72	D	41.3	0.74	E	59.0	0.83	D	41.4	0.74	D	54.1	0.85
		TR	D	35.4	0.28	D	35.1	0.28	D	36.1	0.30	D	35.5	0.30	C	34.4	0.33
		Approach	D	37.3		D	37.4		D	44.6		D	37.7		D	41.8	
	Intersection Overall		C	28.3	0.75	C	28.8	0.77	C	32.3	0.86	C	32.4	0.75	D	37.2	0.86
	NYS Route 31 & I-81 SB Ramps	EB TR (Approach)	D	36.8	0.88	D	37.4	0.89	D	38.5	0.95	B	19.1	0.78	C	22.8	0.89
		WB L	D	51.1	0.50	D	52.1	0.52	E	65.8	0.59	C	20.5	0.45	B	17.9	0.54
		WB T	A	1.0	0.34	A	1.0	0.35	A	2.9	0.40	A	5.1	0.42	A	7.3	0.48
		WB Approach	B	13.9		B	14.2		B	17.4		A	8.6		A	9.7	
		SB LT	E	55.1	0.69	E	55.7	0.70	E	55.7	0.70	D	53.7	0.68	D	54.4	0.71
		SB R	D	44.0	0.08	D	43.9	0.08	D	44.0	0.09	D	43.7	0.09	D	44.1	0.32
		SB Approach	D	50.0		D	50.3		D	49.9		D	48.7		D	49.4	
	Intersection Overall		C	27.1	0.70	C	27.5	0.71	C	29.6	0.79	B	16.8	0.68	B	19.1	0.78
	NYS Route 31 & I-81 NB Ramps /Pardee Road	EB L	D	47.4	0.93	D	51.1	0.95	F	53.2	1.02	C	29.9	0.86	D	43.6	0.95
		EB T	A	7.1	0.44	A	7.3	0.46	A	5.6	0.48	A	5.1	0.41	A	6.4	0.50
		EB Approach	B	17.3		B	18.5		B	17.8		B	11.5		B	15.9	
		WB TR (Approach)	D	44.0	0.89	D	48.1	0.92	D	54.0	0.96	C	30.0	0.76	D	50.7	0.97
		WB L	C	25.2	0.53	C	24.9	0.53	C	29.3	0.70	C	32.1	0.50	C	30.4	0.51
		WB T	C	20.8	0.15	C	20.5	0.15	C	20.5	0.15	C	29.1	0.21	C	27.2	0.22
		WB R	E	60.8	0.97	E	65.6	0.99	E	69.2	1.00	D	46.2	0.87	D	51.2	0.93
		WB Approach	D	45.9		D	48.6		D	50.1		D	39.4		D	41.5	
		SB R (Approach)	D	43.6	0.38	D	43.7	0.39	D	43.7	0.39	D	41.3	0.34	D	40.4	0.37



Intersection	Approach	Movement	2021 Existing			2024 Background			2024 Background w/ Development			2024 Background, Development w/ Build			2044 Background, Development w/ Build		
			LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C
	Intersection Overall		D	35.9	0.96	D	38.5	0.98	F	40.7	1.02	C	27.5	0.88	D	36.0	0.96
NYS Route 31 & Lakeshore Road (unsignalized) <sup>1</sup>	EB	L	B	10.6	0.81	D	34.9	0.86	E	44.1	0.92	E	44.1	0.92	F	208.8	1.38
	SB	R	F	125.7	1.12	F	150.7	1.18	F	206.1	1.32	F	206.1	1.32	F	559.5	2.12
	Intersection Overall		F	125.7	1.12	F	150.7	1.18	F	206.1	1.32	F	206.1	1.32	F	559.5	2.12
Caughdenoy Road/ Maple Rd & NYS Route 481 Off Ramp (unsignalized) <sup>1</sup>	EB	LT	A	8.4		A	8.4		A	8.6		A	8.6		A	8.9	
	NB	LR	A	8.1		A	8.1		A	8.5		A	8.5		A	9.0	
	SB	LTR	A	8.4		A	8.3		A	8.4		A	8.4		A	8.7	
	Intersection Overall		A	8.4		A	8.4		A	8.6		A	8.6		A	9.0	
Caughdenoy Road & Entrance 1 (unsignalized) <sup>1</sup>	WB	L	-	-	-	-	-	-	B	10.6	0.05	B	10.6	0.05	B	10.8	0.05
		R	-	-	-	-	-	-	A	9.1	0.06	A	9.1	0.06	A	9.2	0.06
		Approach	-	-	-	-	-	-	A	9.7		A	9.7		A	9.8	
	SB	L	-	-	-	-	-	-	A	7.7	0.04	A	7.7	0.04	A	7.8	0.04
	Intersection Overall		-	-	-	-	-	-	A	9.7		A	9.7		A	9.8	
NYS Route 31 & Entrance 2	EB	L	-	-	-	-	-	-	B	10.3	0.52	B	10.3	0.52	B	13.6	0.61
		T	-	-	-	-	-	-	B	10.1	0.59	B	10.1	0.59	B	11.2	0.64
		Approach	-	-	-	-	-	-	B	10.1		B	10.1		B	11.7	
	WB	T	-	-	-	-	-	-	B	10.2	0.60	B	10.2	0.60	B	11.5	0.66
		R	-	-	-	-	-	-	A	7.1	0.14	A	7.1	0.14	A	7.1	0.14
		Approach	-	-	-	-	-	-	A	9.4		A	9.4		B	10.4	
	SB	L	-	-	-	-	-	-	B	17.3	0.57	B	17.3	0.57	B	19.3	0.57
		R	-	-	-	-	-	-	B	13.6	0.09	B	13.6	0.09	B	15.3	0.09
		Approach	-	-	-	-	-	-	B	16.0		B	16.0		B	18.0	
	Intersection Overall		-	-	-	-	-	-	B	11.1	0.59	B	11.1	0.59	B	12.3	0.63

<sup>1</sup> Signalized and Unsignalized follow different LOS and Delay results. See TIS Section 5n for more information. Worst approach delay and LOS reported as the overall unsignalized intersection operation.

<sup>2</sup>Volume to Capacity (V/C) Ratio; LOS F when V/C > 1

### Legend

LOS A – C	
LOS D	
LOS E	
LOS F	





**Table 8. AM Peak Hour SimTraffic 95% Queues (feet)<sup>1</sup>**

Intersection	Approach	Lane Group	Storage Length	2021 Existing	2024 Background	2024 Background Development	Proposed Storage Length <sup>2</sup>	2024 Background Development Build	2044 Background Development Build
NYS Route 31 & NYS Route 481 SB/Soule Rd	EB	T	-	190	200	215	-	230	265
		R	-	200	215	215	-	215	290
	WB	L	340	140	140	145	-	135	170
		T	-	135	145	150	-	150	175
	NB	L	260	95	95	100	-	105	100
		R	-	75	75	80	-	80	90
	SB	L	300	170	170	195	-	180	200
		T	-	70	70	90	-	75	80
		R	150	55	60	55	-	65	70
NYS Route 31 & NYS Route 481 NB	EB	L	150	80	85	90	-	90	100
		T	-	110	110	110	-	110	115
	WB	T	-	125	130	130	-	135	150
		R	330	45	50	55	-	50	60
	NB	L	350	155	160	155	-	160	175
		LT	-	190	195	195	-	195	210
NYS Route 31 & Marketfair Plaza	EB	R	250	0	0	0	-	0	0
		T	-	10	10	10	-	10	10
	WB	L	150	20	20	20	-	20	20
		T	-	20	25	25	-	25	30
	NB	L	-	25	30	30	-	30	30
		R	-	10	10	10	-	10	10
NYS Route 31 & Mall West/	EB	L	330	35	35	35	-	35	40
		TR	-	15	10	15	-	15	15
	WB	L	150	0	0	0	-	0	0
		T	-	60	55	60	-	55	65



Intersection	Approach	Lane Group	Storage Length	2021 Existing	2024 Background	2024 Background Development	Proposed Storage Length <sup>2</sup>	2024 Background Development Build	2044 Background Development Build
Water Board Lane	NB	R	150	5	5	5	-	5	5
		LTR	-	0	0	0	-	0	0
	SB	LT	-	30	30	30	-	30	30
		R	-	35	40	40	-	40	45
NYS Route 31 & Mall East/ Lazy B Furniture	EB	L	300	20	20	20	-	20	25
		TR	-	95	95	110	-	105	130
	WB	L	210	35	35	40	-	35	40
		TR	-	90	90	100	-	95	110
	NB	L	-	85	90	85	-	80	95
		TR	-	55	55	60	-	55	60
	SB	LT	-	15	15	10	-	10	15
		R	-	40	40	40	-	40	40
NYS Route 31 & Morgan Road	EB	L	275	60	70	80	-	70	135
		T	-	195	195	260	-	250	330
		R	275	80	85	90	-	90	145
	WB	L	300	75	80	130	-	125	145
		TR	-	115	120	155	-	150	185
	NB	L	550	120	140	140	-	145	165
		T	-	75	80	85	-	80	90
		R	250	40	40	55	-	55	55
	SB	L	400	80	145	70	-	75	165
		TR	-	310	375	295	-	290	455
NYS Route 31 & Henry Clay Blvd	EB	L	425	20	20	20	-	20	25
		TR	-	260	255	385	-	335	430
	WB	L	475	95	95	140	-	135	165
		TR	-	155	155	205	-	180	215
	NB	L	-	-	-	-	300	135	175



Intersection	Approach	Lane Group	Storage Length	2021 Existing	2024 Background	2024 Background Development	Proposed Storage Length <sup>2</sup>	2024 Background Development Build	2044 Background Development Build
NYS Route 31 & Caughdenoy Road	TR		-	170	175	250	-	110	135
	SB	LTR	-	120	125	140	-	145	170
	EB	LTR	-	135	130	230	-	215	260
	WB	LTR	-	120	125	175	-	165	200
	NB	LTR	-	65	65	90	-	90	105
NYS Route 31 & Legionnaire Dr/ Lawton Rd	EB	L	250	15	15	100	-	15	30
		TR	-	175	175	3300	-	235	290
	WB	L	250	45	45	55	-	50	55
		TR	-	95	90	160	-	135	155
	NB	L	130	50	50	55	-	55	55
		TR	-	70	65	100	-	85	105
	SB	L	-	65	70	90	-	75	85
		TR	175	40	35	35	-	40	40
NYS Route 31 & US Route 11	EB	L	225	40	40	135	-	85	120
		TR	-	295	280	>3500	-	425	965
	WB	L	500	150	150	200	450 (double left)	135	140
		TR	-	100	100	135	-	180	190
	NB	L	190	35	30	70	-	65	65
		T	-	60	55	65	-	60	65
		R	-	180	190	175	-	190	215
	SB	L	325	115	120	110	-	115	130
		TR	-	65	70	75	-	75	80
NYS Route 31 & I-81 SB Ramps	EB	TR	-	170	170	>3500	-	185	185
	WB	L	130	185	180	190	130 (double left)	200	225
		T	-	350	330	360	-	120	130
	SB	LT	-	195	240	205	-	180	175



Intersection	Approach	Lane Group	Storage Length	2021 Existing	2024 Background	2024 Background Development	Proposed Storage Length <sup>2</sup>	2024 Background Development Build	2044 Background Development Build
NYS Route 31 & I-81 NB Ramps /Pardee Road	EB	R	200	100	135	120	-	110	100
		L	100	50	50	90	-	75	75
		T	-	65	65	115	-	80	80
	WB	TR	-	595	615	590	-	540	545
	NB	L	450	155	155	290	200 (double left)	180	190
		T	-	110	140	135	-	85	100
		R	100	135	135	125	Lane 1 = 500 Lane 2 = 125	235*	270*
NYS Route 31 & Lakeshore Rd	SB	R	-	1005	990	225	-	225	240
	EB	L	250	90	100	95	-	115	140
Caughdenoy Road/Maple Rd & NYS Route 481 Off Ramp	SB	R	-	420	440	435	-	435	355
	EB	LT	-	0	0	0	-	5	5
	NB	LR	250	40	40	45	-	45	50
	SB	LTR	50	60	65	65	-	65	70
Caughdenoy Road & Entrance 1	WB	L	-	-	-	50	-	45	50
		R	-	-	-	50	-	50	50
	NB	R	-	-	-	0	-	0	5
	SB	L	-	-	-	30	-	30	30
NYS Route 31 & Entrance 2	EB	L	-	-	-	160	-	150	165
		T	-	-	-	170	-	175	210
	WB	T	-	-	-	145	-	145	165
		R	-	-	-	75	-	80	85
	SB	L	-	-	-	195	-	200	215
		R	-	-	-	80	-	80	85

<sup>1</sup>Reported (in feet) from SimTraffic. Synchro underestimate queues in oversaturated conditions.

<sup>2</sup>Proposed storage lengths at mitigated locations only; additional locations need to be reviewed in the future.



\*NBR modeled as no right turn on red. Queues will be lower in the real world.

**Table 9. PM Peak Hour SimTraffic 95% Queues (feet) <sup>1</sup>**

Intersection	Approach	Lane Group	Storage Length	2021 Existing	2024 Background	2024 Background + Dev	Proposed Storage Length <sup>2</sup>	2024 Build	2044 Build
NYS Route 31 & NYS Route 481 SB/Soule Rd	EB	T	-	410	425	480	-	475	670
		R	-	280	280	295	-	295	620
	WB	L	340	220	240	215	-	215	250
		T	-	200	215	215	-	220	245
	NB	L	260	220	220	225	-	220	275
		R	-	120	125	110	-	115	175
	SB	L	300	155	155	175	-	170	195
		T	-	100	115	120	-	130	165
		R	150	130	135	145	-	145	170
NYS Route 31 & NYS Route 481 NB	EB	L	150	170	175	175	-	180	205
		T	-	190	220	210	-	225	315
	WB	T	-	350	375	365	-	385	430
		R	330	90	80	110	-	135	340
	NB	L	350	415	430	435	-	435	445
		LT	-	540	620	645	-	645	1145
		R	220	355	355	355	-	355	335
NYS Route 31 & Marketfair Plaza	EB	T	-	135	145	85	-	85	125
		R	250	35	35	25	-	20	30
	WB	L	150	55	60	65	-	65	170
		T	-	120	125	105	-	135	495
	NB	L	-	130	135	135	-	145	350
		R	-	45	45	50	-	50	205
NYS Route 31 & Mall West/	EB	L	330	130	125	125	-	125	140
		TR	-	30	40	75	-	75	110
	WB	L	150	0	0	0	-	0	0



Intersection	Approach	Lane Group	Storage Length	2021 Existing	2024 Background	2024 Background + Dev	Proposed Storage Length <sup>2</sup>	2024 Build	2044 Build
Water Board Lane		T	-	170	175	170	-	180	225
		R	150	40	25	50	-	40	70
	NB	LTR	-	10	5	10	-	10	10
	SB	LT	-	65	70	70	-	70	75
		R	-	160	170	160	-	160	175
NYS Route 31 & Mall East/ Lazy B Furniture	EB	L	300	40	40	40	-	45	45
		TR	-	80	80	105	-	105	130
	WB	L	210	25	30	25	-	30	35
		TR	-	135	135	150	-	145	155
	NB	L	-	80	75	75	-	80	80
		TR	-	45	50	50	-	50	55
	SB	LT	-	65	65	70	-	65	70
		R	-	55	60	60	-	60	65
NYS Route 31 & Morgan Road	EB	L	275	185	200	210	-	205	285
		T	-	210	220	255	-	250	330
		R	275	95	100	95	-	105	130
	WB	L	300	90	100	140	-	140	185
		TR	-	220	235	270	-	270	325
	NB	L	550	210	220	220	-	225	260
		T	-	150	150	160	-	160	190
		R	250	45	40	50	-	50	65
	SB	L	400	55	60	60	-	65	65
		TR	-	190	195	205	-	210	270
NYS Route 31 & Henry Clay Blvd	EB	L	425	40	70	280	-	55	120
		TR	-	360	395	890	-	430	545
	WB	L	475	80	95	130	-	110	125
		TR	-	275	280	360	-	290	315
	NB	L	-	-	-	-	300	185	250



Intersection	Approach	Lane Group	Storage Length	2021 Existing	2024 Background	2024 Background + Dev	Proposed Storage Length <sup>2</sup>	2024 Build	2044 Build
NYS Route 31 & Caughdenoy Road		TR	-	365	420	485	-	250	335
		SB	LTR	55	60	60	-	70	100
		EB	LTR	185	195	305	-	370	655
		WB	LTR	170	175	225	-	240	340
		NB	LTR	80	80	105	-	110	115
		SB	LTR	50	50	65	-	70	70
NYS Route 31 & Legionnaire Dr/ Lawton Rd	EB	L	250	20	20	95	-	25	90
		TR	-	195	215	1455	-	275	1110
	WB	L	250	90	90	110	-	120	125
		TR	-	145	160	205	-	210	235
	NB	L	130	55	55	60	-	60	70
		TR	-	60	60	75	-	70	85
	SB	L	-	90	95	140	-	105	175
		TR	175	65	65	85	-	70	95
NYS Route 31 & US Route 11	EB	L	225	115	100	205	-	150	240
		TR	-	390	400	>3500	-	620	750
	WB	L	500	220	225	225	450 (double left)	180	185
		TR	-	200	205	200	-	195	210
	NB	L	190	145	160	200	-	195	265
		T	-	275	290	315	-	305	640
		R	-	315	315	360	-	360	630
	SB	L	325	220	225	295	-	215	410
		TR	-	130	135	170	-	140	310
	EB	TR	-	165	160	>3500	-	180	175
NYS Route 31 & I-81 SB Ramps	WB	L	130	205	210	200	130 (double left)	125	145
		T	-	345	335	355	-	235	275
	SB	LT	-	170	180	190	-	170	295
		R	200	80	90	110	-	90	170



Intersection	Approach	Lane Group	Storage Length	2021 Existing	2024 Background	2024 Background + Dev	Proposed Storage Length <sup>2</sup>	2024 Build	2044 Build
NYS Route 31 & I-81 NB Ramps /Pardee Road	EB	L	100	175	170	175	-	165	170
		T	-	350	360	370	-	230	340
	WB	TR	-	605	610	615	-	420	590
		L	450	465	495	580	200 (double left)	210	220
	NB	T	-	760	855	1220	-	140	365
		R	100	165	170	165*	Lane 1 = 500 Lane 2 = 125	500*	545*
	SB	R	-	125	125	165	-	120	130
NYS Route 31 & Lakeshore Rd	EB	L	250	320	350	370	-	365	300
	SB	R	-	190	245	395	-	185	435
Caughdenoy Road/Maple Rd & NYS Route 481 Off Ramp	EB	LT	-	50	50	45	-	50	50
	NB	LR	250	90	95	85	-	85	145
	SB	LTR	50	55	55	55	-	55	60
Caughdenoy Road & Entrance 1	WB	L	-	-	-	45	-	40	45
		R	-	-	-	50	-	45	45
	NB	R	-	-	-	5	-	5	5
	SB	L	-	-	-	30	-	30	35
NYS Route 31 & Entrance 2	EB	L	-	-	-	155	-	165	170
		T	-	-	-	185	-	215	215
	WB	T	-	-	-	180	-	190	190
		R	-	-	-	85	-	90	75
	SB	L	-	-	-	195	-	200	205
		R	-	-	-	85	-	85	85

<sup>1</sup>Reported (in feet) from SimTraffic. Synchro underestimate queues in oversaturated conditions.

<sup>2</sup>Proposed storage lengths at mitigated locations only; additional locations need to be reviewed in the future.

\*NBR modeled as no right turn on red. Queues will be lower in the real world.





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