

**MICRON SEMICONDUCTOR FABRICATION
CLAY, NY
SEQRA EAF ADDENDUM**

September 12, 2023

CONTENTS

- 1 INTRODUCTION..... 1**
 - 1.1 PROJECT OVERVIEW 1
- 2 PURPOSE AND NEED..... 4**
 - 2.1 PURPOSE AND NEED 4
 - 2.2 PROJECT BACKGROUND 4
- 3 DESCRIPTION OF THE PROPOSED PROJECT 9**
- 4 PROPOSED PROJECT OPERATIONS AND SETTING 15**
- 5 AGENCY AND PUBLIC COORDINATION..... 18**
 - 5.1 AGENCY COORDINATION ACTIVITIES 18

TABLES

TABLE 1	PRELIMINARY LIST OF SEQRA LEAD, COOPERATING, AND PARTICIPATING AGENCIES.....	19
TABLE 2	PRELIMINARY LIST OF FEDERAL AGENCIES	19

FIGURES

FIGURE 1	LOCATION OF PROPOSED MICRON CAMPUS.....	3
FIGURE 2	PROPOSED SITE PLAN FOR MICRON CAMPUS	10
FIGURE 3	MICRON CAMPUS AND OFF-SITE IMPROVEMENTS	12

ABBREVIATIONS

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

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1 Introduction

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

Micron is seeking federal funding under the “Creating Helpful Incentives to Produce Semiconductors and Science Act of 2022 (the “CHIPS Act”) and will require certain federal permits and approvals, including, but not limited to, federal wetlands permits pursuant to Section 404 of the Clean Water Act. Therefore, Micron, as the Project Sponsor, will comply with the requirements of the National Environmental Policy Act (NEPA) of 1969 (42 United States Code (U.S.C.) § 4321 et seq.) and Council on Environmental Quality’s (CEQ) NEPA-implementing regulations (40 Code of Federal Regulations (CFR) §§ 1500-1508), as well as the requirements of the New York State Environmental Quality Review Act (SEQRA) (6 NYCRR Part 617) (New York Environmental Conservation Law §§8-0101 et seq).

This document is being provided as an addendum to the SEQRA Environmental Assessment Form (EAF). It provides a description of the Proposed Project, as well as additional information on the purpose and need for the Proposed Project. This document also includes an initial list of agencies likely to either review or permit the Proposed Project.

1.1 PROJECT OVERVIEW

Micron is a world leader in innovative memory solutions that transform how the world uses information. For over 40 years, the company has been instrumental to the world’s most significant technology advancements, delivering optimal memory and storage systems for a broad range of applications. Memory is at the leading edge of semiconductor manufacturing and fuels everything from feature-rich 5G smartphones to the AI-enabled cloud. Micron’s leadership in both DRAM and NAND technologies provides the market-based confidence to invest up to \$100 billion to affirm the company’s industry-leading memory innovation and deliver differentiated products to its customers.

Micron’s proposed semiconductor manufacturing facility campus in the Town of Clay, Onondaga County, New York will be built-out over an approximate 20-year period, and will consist of the construction of four (4) Memory Fabrication facilities (Fabs). Micron expects that the Fabs will be built in sequence, with construction of each Fab starting as the preceding Fab is being fit-out with

manufacturing equipment and operations begun (the DEIS will analyze an interim analysis year as well as a final year of completion). This process will result in continuous construction activities on the site over the approximate 20-year period, with a significant portion of that construction occurring inside previously-constructed Fab buildings. Micron intends to start construction of the Micron Campus in 2024 with Fabs 1 and 2 complete and operational by 2032. Full build-out of the Micron Campus (completion of Fabs 3 and 4) would be complete in 2043. Each Fab is expected to occupy approximately 1.2 million square feet (sf) of land and contain approximately 600,000 sf of cleanroom¹ space, 290,000 sf of cleanroom² support space, and 250,000 sf of administrative space. Each set of two Fabs would be supported by approximately 470,000 sf of central utility buildings³, 200,000 sf of warehouse space, and 200,000 sf of product testing space⁴ housed in separate buildings. The proposed Micron Campus will also include ancillary on-site electrical substations, water and wastewater pre-treatment and storage, and industrial gas storage. The entire Micron Campus, with four (4) Fabs and all ancillary support facilities, driveways, and parking; the jack and bore site; and the Childcare Site (which are described in more detail below) comprise the "Proposed Project."⁵ Off-site water, wastewater, electricity, natural gas, and telecommunication utility improvements necessary for the Proposed Project will be identified as "off-site improvements" and will also be analyzed in the EIS (see Section 3 of this document for additional information on these project components).

The Micron Campus is an approximately 1,400-acre assemblage of land located in an area of the Town of Clay bordered by NYS Route 31 to the south, Caughdenoy Road to the west, a series of National Grid overhead power lines to the north (although the site extends approximately 100 feet beyond the power lines), and the Town of Clay/Town of Cicero boundary line to the east. The majority of the Micron Campus is contained within the Town of Clay, Onondaga County, New York and is accessible from I-81 from an interchange with NYS Route 31 (see Figure 1).

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

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

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

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

⁵ Full development of the four (4) Fab Micron Campus is contingent upon acquisition of all properties within the area identified as the Micron Campus.

FIGURE 1 LOCATION OF PROPOSED MICRON CAMPUS



2 Purpose and Need

2.1 PURPOSE AND NEED

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

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

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

2.2 PROJECT BACKGROUND

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

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

OCIDA's intent in acquiring the lands, was further justified in 1998 with the advent of the SEMI-NY program (as discussed below), resulted in the accumulation of the original 340-acre footprint of the WPCP. The SEMI-NY program was a New York State initiative initiated in 1998 to attract the semiconductor industry to the state by identifying and advancing "qualified" sites that were consistent with conceptual semiconductor industry profiles. OCIDA's objective was to further the County's economic development agenda by providing a site that met the SEMI-NY criteria and could be presented as a qualified site for a semiconductor manufacturing facility under the SEMI-NY program. To support OCIDA's efforts to obtain the SEMI-NY "qualified" site designation for its site, OCIDA prepared a Generic Environmental Impact Statement (GEIS) to assess potential environmental and socio-economic impacts associated with full build-out of the 300-acres by a yet to be determined semiconductor company. The GEIS, which was prepared pursuant to New York's SEQRA process, was released in April 2002.

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

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

OCIDA utilized the development of a GEIS (2012) and the follow up Supplemental Generic Environmental Impact Statement (SGEIS), completed in 2021, to evaluate potential locations throughout Onondaga County for development of a site suitable to attract semi-conductor manufacturing. OCIDA, in 2012 and again in 2021, selected the WPCP as its preferred site to attract private industrial and commercial development because of its size, potential for industrial zoning, access to transportation, proximity of utilities, as well as a history of Town of Clay efforts to facilitate industrial development at the property.

The 2012 GEIS considered the following potential sites in addition to WPCP:

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

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

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

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

alternative candidate sites that the 2012 GEIS assessed, again concluding that “[n]one of the previously considered alternative locations would be able to accommodate the large-scale industrial use that the [White Pine Commerce] Park is promoting due to size limitations and proximity to services and necessary infrastructure.”

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

On August 9, 2022, President Biden signed into law the CHIPS Act making over \$50 billion available “to strengthen American manufacturing, supply chains, and national security, and invest in research and development, science and technology, and the workforce of the future to keep the United States the leader in the industries of tomorrow, including nanotechnology, clean energy, quantum computing, and artificial intelligence.”⁶

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

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

⁶ FACT SHEET: CHIPS and Science Act will Lower Costs, Create Jobs, Strengthen Supply Chains, and Counter China, August 9, 2022, The White House. <https://www.whitehouse.gov/briefing-room/statements-releases/2022/08/09/fact-sheet-chips-and-science-act-will-lower-costs-create-jobs-strengthen-supply-chains-and-counter-china/>

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

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

3 Description of the Proposed Project

Micron intends to build a semiconductor manufacturing facility campus (the "Micron Campus") at the expanded White Pine Commerce Park, which will be built-out over an approximately 20-year period with four Fabs. It is expected that Fabs will be continuously fit-out and construction on the next Fab will be in sequence as the prior Fab finishes fit-out. The EIS will analyze an interim analysis year of 2031 with the first two Fabs open with construction ongoing as well as a final analysis year for the total project with all four Fabs in operation in 2043).

The Micron Campus would comprise approximately 1,400 acres, consisting of the enlarged White Pine Commerce Park parcel studied in the 2021 SGEIS along with additional contiguous acreage acquired or to be acquired by OCIDA. Each Fab is expected to cover approximately 1.2 million sf of land and contain approximately 600,000 sf of cleanroom space, 290,000 sf of cleanroom support space, and 250,000 sf of administrative space. Each set of two Fabs will be supported by approximately 470,000 sf of central utility buildings, 200,000 sf of warehouse space, and 200,000 sf of product testing space housed in separate buildings. The Micron Campus will also have ancillary on-site electrical substations, water and wastewater treatment and storage, and industrial gas storage. See Figure 2 for a preliminary site plan of the proposed Micron Campus.⁷

Two (2) additional properties will be developed with uses ancillary to the Micron Campus (see Figure 3):

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

The Micron Campus, with four (4) Fabs and all ancillary support facilities, driveways, and parking; the jack and bore site; and the Childcare Site comprise the "Proposed Project."

⁷ Modifications to the preliminary site plan may, ultimately, reduce the footprint of the areas shown for "electrical easement." Micron is working with National Grid to refine plans for proposed electrical interconnections.

FIGURE 2 PROPOSED SITE PLAN FOR MICRON CAMPUS



Off-site energy (natural gas and electricity), telecommunications, water, wastewater utility, and rail spur improvements will also be required and will be identified as “off-site improvements” necessary for the Proposed Project and analyzed in the environmental review, as well as in a separate regulatory process before the New York Public Service Commission with regard to the electric transmission lines needed for the Proposed Project (see Figure 3). The following off-site improvements have been identified:

Energy

- Extension of a 16-inch diameter natural gas line from National Grid's Gas Regulator Station (GRS) 147 at 4459 NYS Route 31 to the Micron Campus (approximately 3.15 miles) and construction of GRS 147A at the same address as the existing GRS;
- Construction of four (4) underground electrical transmission duct bank connections from the existing National Grid sub-station west of Caughdenoy Road.

Telecommunications

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

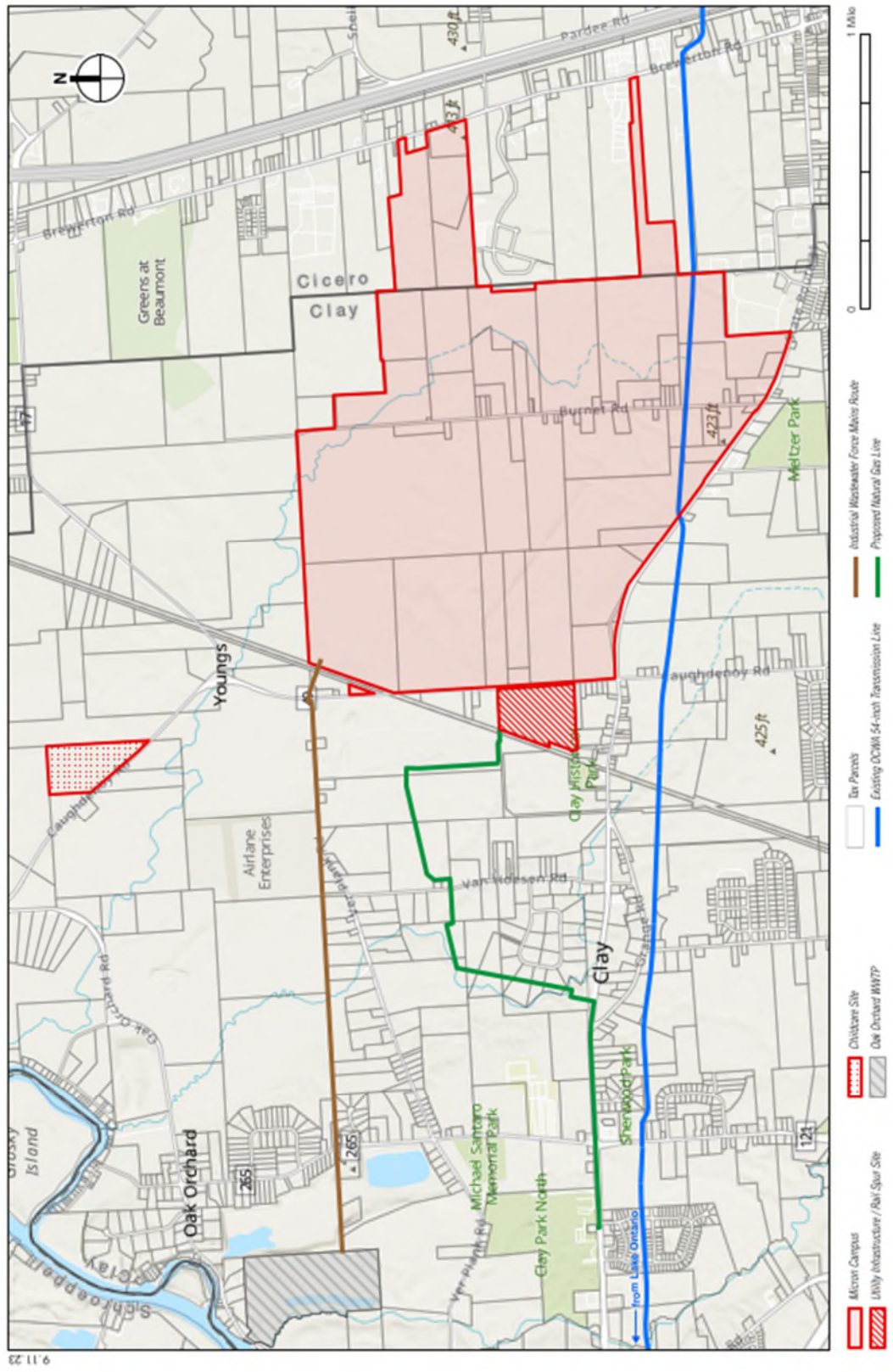
Water Supply

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

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

- Construction of a new Raw Water Tunnel and Raw Water Pumping Station at OCWA's existing Burt Point property on Lake Ontario (City of Oswego);
- Construction of a new Raw Water Transmission Main from Burt Point to OCWA's Lake Ontario Water Treatment Plant (LOWTP) using an easement that OCWA obtained for such purposes in the 1990s;
- Modification to the LOWTP with addition of two (2) new filters, one (1) contact basin, and one (1) new clearwell as well as additional chemical storage space and residual handling facilities;

FIGURE 3 MICRON CAMPUS AND OFF-SITE IMPROVEMENTS



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

Wastewater

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

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

Utility Infrastructure/Rail Spur Site

Related to the Proposed Project, Micron has proposed to construct a rail spur on an approximately 36.9-acre adjacent parcel on the west side of Caughdenoy Road (Town of Clay tax parcel 046.-02-03.2) (the "rail spur site"). The rail spur will be used to deliver construction aggregate to the Micron Campus to reduce construction vehicle impacts on the local community from construction

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

4 Proposed Project Operations and Setting

The SEQRA EAF prepared for the Proposed Project includes a number of instances of “TBD” as detailed information on many aspects of the construction or operation of the Proposed Project are being developed through on-going detailed technical studies. The information will be presented in the Draft Environmental Impact Statement (DEIS) being prepared by Micron.

This section of the EAF Addendum provides additional information to facilitate an understanding of where significant adverse environmental impacts may result from the Proposed Project. Item numbers reference section and sub-section numbers in the EAF where Micron believes significant adverse impacts may occur.

D.2.b Development of the Micron Campus and off-site infrastructure will likely result in impacts to Federal and New York State wetlands. Micron is completing a comprehensive delineation of all wetlands within areas of disturbance associated with the Proposed Project and has initiated consultation with the United States Army Corps of Engineers (USACE) and New York State Department of Environmental Conservation (NYSDEC). Specific options for mitigation have not been developed but will be identified in the DEIS.

D.2.c Micron has initiated consultation with the Onondaga County Water Authority (OCWA) regarding the necessary infrastructure improvements that would be required to provide approximately 48 million gallons per day to the Micron Campus. See Section 3, above, for an identification of the infrastructure improvements that would be required for the Proposed Project.

D.2.d Micron has initiated consultation with the Onondaga County Department of Water Environment Protection (OCDWEP) regarding the necessary infrastructure improvements that would be required to convey and treat sanitary wastewater and industrial wastewater generated by the Micron Campus. See Section 3, above, for an identification of the infrastructure improvements that would be required for the Proposed Project.

D.2.e Micron will develop a Stormwater Pollution Prevention Plan (SWPPP), or multiple SWPPPs, covering all areas of disturbance that would be required for the Proposed Project. The SWPPP(s) will be prepared as part of a complete Site Plan application to the Town of Clay Planning Board and reviewed by the Town of Clay as the designated Municipal Separate Storm Sewer System (MS4).

D.2.f/D.2.g/D.2.h The Proposed Project will generate new air emissions from mobile sources (vehicles) and stationary sources (on-site emissions). Micron is coordinating with NYSDEC to identify likely compounds that could be emitted and the quantities of such compounds in support of a planned Title V Permit submission.

D.2.j Micron has initiated consultation with the New York State Department of Transportation (NYSDOT), the Federal Highway Administration (FHWA), Onondaga County Department of Transportation, the Town of Clay, and the Town of Cicero to identify the requirements for a comprehensive traffic impact study that will be included in the DEIS.

D.2.k Micron has initiated consultation with New York Power Authority, National Grid, and the New York Independent System Operator (NYISO) to identify the necessary energy infrastructure that would be required to serve the Proposed Project. See Section 3, above, for an identification of the infrastructure improvements that would be required for the Proposed Project.

D.2.m Micron is conducting a comprehensive noise assessment to identify any potential impacts related to construction or operations noise from both mobile sources (vehicles accessing the site) and stationary sources (equipment on-site).

D.2.n Micron is preparing a detailed lighting plan for the proposed Micron Campus and will evaluate potential effects of lighting on surrounding properties.

D.2.p The Micron Campus will include a number of storage tanks and containers that are compliant with regulations. Secondary containment structures will be provided, as warranted. The DEIS will identify the likely materials and quantities to be stored on the Micron Campus. Micron will continue to coordinate with NYSDEC on any permitting for bulk storage.

D.2.q Micron intends to develop an Integrated Pest Management (IPM) plan. The IPM plan may address methods for management of noxious, non-native, and/or invasive species during construction and over the life of the Proposed Project.

D.2.r/D.2.t Micron is developing a comprehensive inventory of waste streams to be managed at the Micron Campus, including both hazardous and non-hazardous wastes. Preliminary estimates indicate approximately 45,000 tons per year of waste would be generated during operations. Additional detail will be provided in the DEIS. Micron will coordinate with Onondaga County and/or the NYSDEC on any applicable permitting.

E.1.b The EIS will include a complete assessment of land use and cover types based on field studies and mapping being conducted in Spring and Summer of 2023. Numbers presented in the EAF are from best-available resources prior to completion of the detailed field studies.

E.1.d A detailed inventory of land uses surrounding the Micron Campus will be part of the DEIS and will provide information on potentially sensitive land uses that would be evaluated as part of detailed technical studies (e.g., noise, air emissions).

E.1.h The DEIS will include detailed information relating to the potential history of contamination at the proposed Micron Campus and at proposed off-site utility corridors. The information will

include summaries of historic operations at these locations, if any, as well as Federal, State, and local databases of known or potential spills.

E.2 The DEIS will include detailed information relating to natural resource conditions on or near the Micron Campus. Information on depth to bedrock, soil type, slope, and wetlands will be developed based on detailed technical studies being conducted in Spring and Summer of 2023. Micron has initiated consultation with the United States Fish and Wildlife Service (USFWS) and NYSDEC to identify potential threatened, endangered, or special status species that may exist on or near the Micron Campus. Micron has initiated detailed field studies of potential habitat for Indiana bat and sedge wren in Spring 2023 pursuant to protocol reviewed by USFWS and NYSDEC.

E.3 Micron has initiated consultation with the New York State Historic Preservation Officer (SHPO) regarding any buildings, archaeological sites, or districts listed on, or eligible for listing on, the National or State Register of Historic Places. Field studies of existing structures and areas potentially disturbed by the Proposed Project are being conducted in Spring and Summer 2023. Micron is conducting a visual impact assessment consistent with NYSDEC Program Policy DEP-00-2, "Assessing and Mitigating Visual and Aesthetic Impact" (2019). A five-mile radius from the Proposed Project is being evaluated consistent with that Program Policy.

5 Agency and Public Coordination

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

5.1 AGENCY COORDINATION ACTIVITIES

The agency coordination process will include coordination with various Federal, State, and local agencies (see Table 1, "Preliminary List of SEQRA Lead, Involved, and Interested Agencies" and Table 2, "Preliminary List of Federal Agencies").

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

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

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

TABLE 1 PRELIMINARY LIST OF SEQRA LEAD, COOPERATING, AND PARTICIPATING AGENCIES

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

TABLE 2 PRELIMINARY LIST OF FEDERAL AGENCIES

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