

Respectfully accept these comments and suggestions for mitigation from the board members of Climate Change Awareness and Action, Inc.

We are writing in response to your request for the Central New York Community to respond to the Draft Environmental Impact Statement (DEIS) related to the Micron Project proposed for the Syracuse area.

We are Climate Change Awareness and Action, Inc.(CCAA). We organized 10 years ago for the purpose of educating others and actively working towards reversing the human caused climate disruption that threatens the earth. We are a local 350.org group, centered in Syracuse, New York.

Our mission is to reduce the amount of greenhouse gases in the atmosphere through individual and community education and action while supporting fair and just public policies and legislation. It is in this vein that we are responding and commenting. Specifically, we are referencing Chapter 3.7 (3-183-3-215), Greenhouse Gas Emissions (GHG), Climate Change, and Climate Resiliency.

Your lead statement references:

"The effects of climate change are driven by the combined emissions from various sources across the globe, rather than from any single event or emission. Each contribution, whether large or small, adds to the overall warming of the planet. As such, when assessing the impact of a specific project, it is essential to consider how its emissions across alternative scenarios (including a scenario with no project) fit in relevant context into broader global and regional emissions, its contribution to the ongoing accumulation of GHGs in the atmosphere, and how the project and alternatives may impact climate commitments and goals. This approach allows an agency to present the environmental and public health effects of a proposed action in clear terms and with sufficient information to make a reasoned choice among the alternatives and consider appropriate mitigation measures. This section describes the environmental setting of the Proposed Project, and assesses, to the extent practicable, GHG emissions from the semiconductor industry broadly and, more specifically, from the Proposed Project alternatives, and considerations of ongoing climate change effects."

This statement acknowledges the DEIS attempt to include many relevant concerns about the Proposed Project, but fails to address the impact of Connected Actions on GHG emissions and Climate Change. The net finding of the DEIS is that there will be

harmful impact to Climate change from the Proposed Project construction and operations. These will be commented on separately below.

Proposed Project:

1. The boundaries set to analyze greenhouse gas emissions at the construction site seem arbitrary and the radius unlikely to capture the plume of emissions resulting from GHG emissions during construction and operations. The Environmental Justice (EJ) Screening Tool on the Environmental Protection Agency website is not operational under the current federal administration. This is a key "real time" monitoring tool used by the public and science community to determine what is happening in our region related to emissions and climate change, as well as other environmental effects from the Proposed Project.

Recommend:

1. Repeat the GHG assessment using a 5 mile radius from the center of the Proposed Action. Modify monitoring sites and frequency based on this new radius.
2. Restore the EJ screening tool on the EPA website. If not possible, ask that NYSDEC develop an EJ screening tool with the same parameters and data as was available on the federal EPA site.
3. As part of GREEN CHIPS legislation which is funding Micron, they are required to achieve 100% renewable energy for electricity use. The DEIS is vague on the source of renewable energy, listing solar on some buildings. Currently we are concerned that the Micron Proposed Project plans to draw from existing hydro, solar, wind, and nuclear sources. These energy sources are barely adequate to support existing developments and communities. (According to the Climate Leadership and Community Protection Act (CLCPA), nuclear energy is a non-carbon energy source, and is a non-renewable energy source.)

Recommend:

- a. Transparency related to proposed renewable energy sources to support electricity involved in building and operations of the Proposed Project. (Consider hydro, solar, wind, geothermal, biofuels as clean renewable energy.) Introduce clean renewable energy at the beginning of the project and throughout the project, including new technologies as they emerge. These should be independently sourced and funded by Micron and not regional or state taxpayers. The information provided is that carbon free electricity will be needed equivalent to 2 million households or 2 billion kilowatt hours per year.
- b. What is the timeline for the achievement of 100% renewable energy electric that does not rely on the current electric grid renewable energy sourced in Central New York?
- c. Look at electric battery storage instead of diesel generators for back up sources of energy

4. The DEIS lists natural gas as the energy source to operate the 4 fabs in an amount equivalent to run 107,000 households. Fossil fuel is not a renewable energy source. The DEIS has concluded that GHG Emissions will have a negative impact on climate change.

Recommend:

a. Is natural gas the only possible fuel to operate fabs? As technology evolves and each phase of construction occurs, Micron should commit to reassess the possibility to use renewable energy to operate the fabs and thereby reduce GHG emissions as part of climate resiliency and mitigation of climate change. The Climate Leadership and Community Protection Act is clear that a transition to renewable energy is required to lower greenhouse gas emissions and reverse and mitigate climate change.

b. Can biofuels or other alternatives such as anaerobic digestion be used in part or 100%? State University of New York Environmental Science and Forestry, located in Syracuse, NY, has a biofuels program using willows, so biofuels could potentially be sourced locally. See #6 below, Food scraps regarding anaerobic digestion.

c. What mitigation is proposed to reduce emissions of greenhouse gas into the air?

d. When GHG emissions occur that have a negative effect on climate change, what financial or other penalty will Micron incur?

5. Natural gas used for other purposes is not clear. Operation of natural gas boilers is listed, and if this is for heating, is a source of carbon and greenhouse gas emissions that could be mitigated by choosing a renewable energy source for heating and cooling, especially with Micron committing to a carbon free future and 100% renewable electric.

Recommend: could cold climate heat pump technology be used in place of natural gas?

6. New York State has a House Energy Rating System (HERS) HERS is a widely recognized system for measuring a home's energy efficiency. It is the industry standard for assessing a home's energy performance and is often required for new construction and some renovations in many towns and villages.

Recommend: Conduct an energy rating assessment of current Proposed Action and adjust Proposed Action to comply with 2020 HERS guidelines which are minimum standards set for the state. Net goal for the state is set within the Climate Leadership and Community Protection Act and is net zero or negative carbon. Net-zero carbon – construction refers to achieving zero or negative carbon emissions during a building's construction, from product manufacturing to practical completion. This can be achieved through carbon offsets or by exporting on-site renewable energy.

7. Food Waste for a large facility construction and operations can be substantial. Food Waste becomes GHG Emissions which affects climate change. NYS has a Food Scraps Donation and Recycling Law, which will be expanding in 2027. <https://dec.ny.gov/environmental-protection/recycling-composting/organic-materials-management/food-donation-scraps-recycling-law>

Recommend:

a. Establish an on-site anaerobic digester, or composting facility during Phase I. Having a facility on site will allow for immediate disposal of food waste, and lessen hauling and generation of GHG emissions from hauling and landfills. If there is a composting facility, compost could be used on the landscape as part of mitigation. Anaerobic digestion could produce energy for the Proposed Action.

b. Establish a plan for food scraps donation, while keeping further GHG emissions from hauling food waste low.

c. Do the right thing by the community, don't wait to "measure" that you have to do this based on food waste mass.

8. Wetlands will be removed as part of the Proposed Action. All wetlands sequester carbon from the atmosphere. Removal of wetlands will result in GHG emissions from the demolition process, as well as destroy a source of carbon sequestration.

Recommend:

a. DEIS should include a GHG emissions inventory considering loss of wetlands and its impact on climate change. That assessment should widen the considered corridor as adjacent waterways/agricultural lands/forests will also be affected.

b. The Climate resiliency plan should consider details of all mitigation efforts related to loss of wetlands, including cascading effects to waterways/flooding, effects on GHG emissions, regional impact on flora and fauna, change in habitat to bats and other animals which could result in an increase in insects hazardous to health of people and other animals, , such as mosquitoes that carry diseases like eastern equine encephalitis and west nile virus https://www.health.ny.gov/press/releases/2025/2025-07-22_west_nile.htm or insects that eat agricultural crops. Ultimately mitigation efforts of lost wetlands should result in net zero carbon or negative carbon.

8. Energy choices appear to have been made by Micron employed personnel.

Recommend: An Independent third party assess the Proposed Project for renewable energy source options and mitigation of Greenhouse Gas Emissions

9. DEIS and other information indicates that by the time the Proposed project is completed, there will be an estimated 5 million tons of greenhouse gas emissions.

Recommendation: What is the over time mitigation and climate resiliency strategy for these emissions that will cause climate change as admitted by the DEIS review? How will this be followed over the lifetime of the design, construction and operation of the Proposed Project?

10. Parking spaces are listed as 12,000.

Recommendation:

a. What are the greenhouse gas emissions and impact on climate change associated with filling these parking spaces to operate the plant?

b. Review the possibility of carport solar for all parking spaces as a renewable energy source on campus.

11. The DEIS public comment period of 45 days is inadequate to do justice to the size of this project.

Recommend: extend the comment period to 120 days as requested by numerous environmental organizations and the public.

12. Environmental impacts will be immediate and ongoing as a result of the Proposed Project. There are consequences and needed actions that are impossible to consider over the duration of the project, especially given how quickly technology changes.

Recommend:

a. Establish an advisory conservation council that includes local public experts in conjunction with Micron that meets regularly to review design, construction, operations throughout the life of the Proposed Project and its operation.

b. Request additional review open to public comments if there are any approval decisions requiring upgrades and improvements during buildout of Fab 1 and 2.

c. Request a rigorous supplemental DEIS review with public comment prior to the design and construction of Fab 3 & 4.

Connected Actions:

1. The Connected Actions DEIS review established corridors to assess environmental impact that do not capture the reality of GHG emissions being in the air and "mobile". The connected actions include rail spurs, highway interchanges which will require extensive transportation during demolition, construction, and eventual operations. Secondly, because of the large employment at the facility, there will be additional environmental impacts from daily transportation, and building of necessary housing and support. The Environmental Justice (EJ) Screening Tool on the Environmental Protection Agency website is not operational under the current federal administration. <https://ejscreen.epa.gov/mapper>.

This is a key "real time" monitoring tool used by the public and scientific community to determine what is happening in our region related to emissions and climate change, as well as other environmental effects from the Proposed Project. A temporary and incomplete private site does not contain adequate data on the Connected Action corridors. <https://pedp-ejscreen.azurewebsites.net/>. What data is there, indicates that Syracuse is already in the 95-100% level on toxic releases to the air, and that Clay-Dewitt corridor along Highway 481 is 50-90% depending on location. This is before the I-81 diversion to 481 that will increase traffic on Highway 481.

Recommend:

- a. Repeat the GHG emissions assessment using a 5 mile radius from the center of all Connected Actions. Modify monitoring sites and frequency based on this new radius. Reassess annually and after each phase. After reassessment, Generate recommendations about energy sources in order to further lower GHG emissions to mitigate climate change.
- b. Restore the EJ screening tool on the EPA website. <https://ejscreen.epa.gov/mapper>. This will allow the public and environmental groups and scientists to remain fully active in the process throughout the Connected Actions construction. If not possible, ask that the NYSDEC develop an EJ screening tool using the same parameters and census data that was on the EPA website

2. Rail Spur Connected Action -

- a. What is the projected environmental impact/GHG emissions from the operation of 60x60x60 rail cars daily to build Micron?
- b. What fuel will be used in this process?
- c. What monitoring is proposed?
- d. What will be the projected rail traffic pattern related to Micron in terms of volume of rail cars, time of operations, GHG emissions from the Rail Spur Connected Action travel to and from the CSX Dewitt Rail Yard East End , 434 Ellis St, Syracuse NY 13210?
- e. What is the impact of Rail Spur construction on wetlands/other surface water using the 5 mile radius? See discussion of wetlands above
- f. What are the plans to use non fossil fuel options to reduce GHG emissions?

3. Highway Interchanges -

- a. What are the projected GHG emissions related to construction and daily traffic at each new Highway interchange that is being built as a Micron Connected Action? Include as much detail as possible.
- b. What is the impact of Highway interchanges construction on wetlands/other surface water using the 5 mile radius? See discussion of wetlands above
- c. What are the plans to use non fossil fuel options to reduce GHG emissions?

4. Electricity conduit -

- a. What are the projected GHG emissions related to construction and management of new electricity conduits?
- b. What is the impact of electricity conduit construction on wetlands/other surface water using the 5 mile radius? See discussion of wetlands above
- c. What are the plans to use non-fossil fuel options to reduce GHG emissions?

5. Water conduit

- a. What are the projected GHG emissions related to construction and management of new water conduits? What is the energy consumption to move the water used in Micron building and operations?
- b. What is the impact of water conduit construction on wetlands/other surface water using the 5 mile radius? See discussion of wetlands above
- c. What are the plans to use non-fossil fuel options to reduce GHG emissions?

6. Natural Gas conduit

- a. What are the projected GHG emissions related to construction and management of new natural gas conduits?
- b. What is the impact of natural gas conduit construction on wetlands/other surface water using the 5 mile radius? See discussion of wetlands above
- c. What are the plans to use non-fossil fuel options to reduce GHG emissions?

7. Energy choices for connected actions appear to have been made by Micron employed personnel.

Recommend: An Independent third party assess the Connected Actions for renewable energy source options and mitigation of Greenhouse Gas Emissions.

8. There are 12,000 parking spaces at the Proposed Action location. What is the expected traffic and patterns and the expected Greenhouse Gas Emissions of that traffic? What effect on climate change will there be from that traffic?

In summary, the Micron Project is vast. All aspects of the lives of Central New Yorkers will be impacted. We have just scratched the surface of some of the issues that still need to be addressed, focusing on the responsibility that Micron bears in view of the climate policies and laws of New York State.

As part of the GREEN CHIPS legislation championed and signed into law by Governor Kathy Hochul, Micron will be required to manufacture semiconductors under leading-edge sustainability commitments designed to mitigate its greenhouse gas emissions and environmental impact, including utilizing 100% renewable energy, attaining LEED Gold status, and committing to greenhouse gas emission targets and reporting. In addition to Micron's responsibility to follow the letter of the law, it is also the responsibility of New York State to monitor and enforce its own stated environmental laws and policies. NYS is one of the few states that has an Environmental Amendment to the Constitution. We take it seriously. Thank you for your prompt and thorough attention to our review and comments.

Each person shall have a right to clean air and water, and a healthful environment.

Climate Change Awareness and Action, Inc.

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