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**MICRON SEMICONDUCTOR MANUFACTURING PROJECT, CLAY, NY, DRAFT ENVIRONMENTAL IMPACT STATEMENT (JUNE 2025)**

This document provides comments on the Draft Environmental Impact Statement (DEIS) by CNY Solidarity Coalition, 226 Teall Ave, PO Box 6137, Syracuse, NY 13217, <cnysolidarity@gmail.com>

1. Wetlands
   1. Micron will destroy about 200 acres of wetlands.
   2. These wetlands have many benefits
      1. Habitat for endangered species, including the **Indiana bat** and the **Northern Long-eared Bat**, both of which are listed as endangered species under federal and New York State law. Other bat species detected on the site include the little brown bat, big brown bat, tri-colored bat, eastern red bat, hoary bat, and silver-haired bat.
      2. Many species of insects and birds
   3. What is Micron proposing
      1. Replace wetlands with a series of unconnected parcels that will develop over time into wetlands. This development could take a generation. What does that mean for the flora and the fauna whose habitat has been destroyed?
   4. The area around the plant site is prone to flooding. The wetlands provide a buffer to manage surface water during heavy rain. The existing plant will cover 1400 acres between the buildings, the parking lots and other hard surfaces. There has already been testimony at public hearings that flooding is an issue in the area around the location of the proposed Micron plant. This is in spite of the presence of the wetlands which help to reduce flooding by providing a water sink during heavy rains. However, no mention has been made in the DEIS of settling ponds to deal with water runoff or other efforts to mitigate the clearly increased potential for flooding in the area.
   5. The DEIS proposes parking lots capable of handling 12,000 vehicles. According to a calculation by the University of Tennessee ([University of Tennessee Parking Calculation](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https:/utia.tennessee.edu/cpa/wp-content/uploads/sites/106/2020/10/CPA-222.pdf)), one acre of land can accommodate about 150 standard sized cars. For a parking lot accommodating 12,000 vehicles, that translates to about 80 acres. However, the actual area required is likely to be at least 90 acres. We are proposing a significant role for mass transit to brings workers to the plant and hopefully reduce the parking requirements by at least 50%. This will reduce hard surfaces by at least 45 acres and subsequently reduce water runoff mitigation required mitigation. In addition, we propose using porous surface material in the parking lots and internal roadways to further reduce runoff.
2. PFAS and other chemical compounds
   1. PFAS refers to a family of chemicals that are highly toxic and chemically stable (thus the nomenclature “forever chemicals”) There are over 10,000 thousand of these compounds and only a few have been characterized. Only two of these compounds are currently listed as toxic by the EPA, PFOA and PFOS
      1. There is no identified lower limit to their toxicity. A few parts per trillion is still considered toxic
   2. They will be used in the chip-making process
   3. They will be present in the wastewater that will be sent to the improved Oak Orchard Water Treatment Plant in Clay. The treated water will be discharged into public waterways which will eventually lead to the Oswego River and Lake Ontario. The discharge point in Lake Ontario is within 2 miles of the intake ports for domestic water from Lake Ontario for Onondaga County.
   4. It is unlikely that the PFAS in the water passing through that plant will be removed by the processes in the plant.
   5. PFAS will also be present in solid waste that will be removed from the site to a landfill, not yet identified. Micron must ensure that no PFAS can enter the ground and potentially contaminate the existing water table.
   6. Many other hazardous chemicals will be used in the Fabs. Some, but not all, have been identified by Micron. Many have not.
   7. Micron must use the most effective processes to destroy PFAS and other toxic chemicals before they leave the plant, regardless of their cost. No PFAS must be allowed to enter the public waterways of New York State.
   8. Micron must also plan to invest in improved PFAS destruction processes as they become available over time.
3. Energy
   1. Micron will use as much electricity as the states of Vermont and New Hampshire combined, or the equivalent of more than 1 million homes or the entire output of a nuclear power plant.
      1. By itself, Micron will increase the state’s energy usage by 5%
   2. Micron is subject to the provisions of New York’s landmark CLCPA legislation, which requires zero greenhouse gas emissions from electricity generation by 2040.
   3. Micron has pledged to use 100% renewable electricity
      1. The only way it can do this is by increasing renewable energy through solar, wind, and geothermal generation.
      2. Renewal energy credits do not actually increase generation and should not be allowed to meet the goal of 100% renewable energy.
   4. Micron should not use electricity from existing nuclear power plants. All that does is divert that electricity from other users and does not increase generation. Although nuclear power does not generate greenhouse gases during the electric generation process, large amounts of nuclear waste are generated and the time it will take and the cost to build the nuclear generating plant could be used to create sufficient renewable energy sources that will meet Micron’s needs without the negative effects of nuclear power.
   5. The DEIS does not ensure that Micron’s massive demand for water and electricity won’t result in increased costs for ratepayers in terms of increased water and electricity rates. The DEIS must address the potential for these increases and ensure that they do not burden New York’s residents with them.