

Remarks 12/29 re Oak Orchard Municipal Expansion Project

My name is Dr. Sonia Kragh. I have degrees in biology, chemistry and medicine and reside in the Town of Dewitt, Onondaga County.

The request for proposed increase and improvement of the Oak Orchard Municipal Expansion Project, at a maximum estimated cost of \$549,500,000 is problematic on multiple levels.

1. Neither the county legislators nor the public have received detailed presentations about the upgrade plans, cost breakdown, potential outside funding sources and sustainability measures to fuel the upgrade.
2. Confidence in the county water management are at an all time low following failure of the launch of the biosolids drying facility and a main water break affecting water delivery to Onondaga county households and businesses. DEC permit open comments of the facility related to Micron concluded on 12/23/25 and indicate that permitting was last done in 2019. The public has no idea what is working and not working at the current facility.
3. Assuming upgrades do need to be done, this is as a MUNICIPAL facility and should address current wastewater needs, future residential and commercial growth, but should NOT include needs that Micron's factory may have.
4. The engineering plans and permitting information as well as Micron's timeline would suggest that Micron and Onondaga County are upgrading the Oak Orchard Wastewater Treatment Plant to bridge Micron needs during demolition, construction and operations of Fabrication Plants one and Possibly two. Industrial needs are different than municipal needs. Certainly, Onondaga county can agree to upgrade the municipal plant to manage Micron municipal wastewater at a billed cost to Micron. However, the technology needed to recycle water to pure state for chip production and then treat it to safe standards to release into the Oneida and Oswego rivers and Lake Ontario should be done in a separate Industrial Wastewater Treatment Plant built and paid for by Micron.
5. Upgrades both municipal and Industrial should include plans for renewable energy with heat pumps, rooftop and ground solar, and battery storage to locally provide the massive energy needed for these operations. Onondaga County has existing solar panels at Oak Orchard which may be part of the solution, although Micron plans indicate the Solar Array will be removed or moved.
6. Finally, I ask that you postpone the current measure for the Municipal upgrade funded by 549.5 million dollar bonds until these concerns can be addressed with further public and legislator input.

Thank You. Sonia Kragh, 107 Cross Road, Syracuse NY 13224 sykragh@yahoo.com

PUBLIC HEARING Statement of John Przepiora, PE (retired/unregistered)

RE: Proposed Improvements for the Onondaga County Sanitary District

December 29, 2025

Thank you for the opportunity to speak. I am John Przepiora, a resident of the city of Syracuse.

I question the timing of this special meeting, and the lack of substantial citizen/resident engagement relating to this resolution, and of the entire Micron development in general. A special meeting in the middle of the holiday season is not a great way to get residents to participate in this important matter.

I am concerned that the growth induced by Micron and the county's economic development plans will require a significant rate increase for wastewater, though this is not the only rising cost county residents will experience in the name of economic development. Electricity, housing, and other municipal service costs will surely increase. The PILOT has already given away tax revenue that could have offset rising costs for those on fixed incomes.

More engagement with the public and a healthy dose of transparency are sorely needed. When people experience

futility, a lack of understanding and control over what their government is doing, skepticism grows.

WEP held a public meeting in November, however I don't know anyone outside of county government who knew of it or attended the hearing except for Glen Coin of the Post Standard. The effort to include members of the public deserves a grade of F.

A significant source of skepticism is over the adequacy (or perhaps inadequacy) of environmental protection. Micron will bring a massive chemical plant, yes chemical plant for that is what a chip fab ultimately is, **and it is unclear how Micron and WEP intend to ensure that highly hazardous PFAS, known as forever chemicals, will be kept from the environment. Until there is complete transparency and understanding about this issue this bond resolution must not be approved.**

A program of environmental oversight and monitoring needs to be created to ensure public health and safety, and protect the natural environment from pollutant discharges to waterways, and from biosolid management and disposal. A county and Micron funded environmental review and oversight council, including robust environmental monitoring, must be included in the Oak Orchard project approval.

We know that a substantial part of this sewage treatment upgrade is specifically being built for Micron. How much of the

proposed expenditure is planned for processes specifically designed for Micron's construction and start-up industrial wastewater, so called bridge projects, and **the water re-use facility, for example? Why isn't Micron paying for these? Relatedly, what risk is Onondaga County shouldering for potential damage to the environment?**

Until there is more effective public engagement, a monitoring program to ensure public safety, and clarity about these issues, the proposed bond resolution must not be approved.

WRITTEN STATEMENT FOR THE RECORD
Public Hearing on Bond Resolution
Oak Orchard Service Area WWTP Expansion

Submitted by:

Shannon Pagano, P.E. and Cosimo Pagano, P.E.

Onondaga County Residents and Ratepayers within the Onondaga County Consolidated Sanitary District

Date: December 22, 2025

Public Hearing preceding December 29, 2025 \$550M Bond Resolution for Oak Orchard Service Area WWTP Expansion

Purpose of This Statement

We are residents of Onondaga County and ratepayers within the Onondaga County Consolidated Sanitary District. We support the proposed expansion of the Oak Orchard Wastewater Treatment Plant (OOWWTP). Our comments focus on financial transparency and whether the Legislature has enough information to responsibly approve a \$550 million bond resolution.

Why This Matters

- The County is considering \$550 million in long-term debt for this project.
- This decision will affect County debt and sewer rates for decades to come.
- Under New York State law, the Legislature must ensure that sewer rents and charges can cover these and all other Consolidated Sanitary District O&M and capital costs over time.
- The Legislature must also ensure that the County has the financial capability to fix current, ongoing Clean Water Act violations.

Areas of Missing Information:

1. Unverified Capital Project Cost

The Map Plan and Report (MPR) in the public record states the project will cost \$550 million, but:

- The MRP lacks detailed documentation on project capital cost breakdown, engineering fees, construction assumptions, contingencies and risk allocation, and soft and ancillary costs.
- The Map Plan and Report acknowledges that land acquisition may be required for power and natural gas utility upgrades. It is unknown what this potential cost is and if it is included in the \$550M budget.
- The November 2025 *OOWWTP Expansion Program Basis of Design/DEC Engineering Report* references a “Reuse Upgrade” and “Recycled Water Pump Station”, which have also been included in the draft NYSDEC SPDES permit; however, neither project scope are referenced in the MPR. It is unknown what this potential cost is and if it is included in the \$550M budget.
- No explanation in the MPR of what portion of the costs are for improvements to the existing facility and to be paid by all current users, and which are associated with increasing

service area capacity and should be paid by properties in the service area that benefit from the additional capacity (*County Administrative Code Section 11.54 (b)*)

This missing information makes the \$550M figure more of an assertion than a verified estimate and prevents the evaluation of cost allocation between current and future users.

2. Unverified O&M Project Cost

The MPR states the project's annual O&M is \$9.16M, but:

- There is no detailed breakdown of costs such as labor, equipment, materials and supplies, chemicals, electric utilities or sludge disposal.
- The MPR does not provide details on "short-lived assets" – things like blowers, pumps, instrumentation, that last 5-10 years but will need to be replaced over the duration of any bond duration.
- No details are provided for the O&M associated with the "Bridging Project"
- There are no details on how the O&M costs will change over time due to increased treatment flows, inflation, etc.

This makes the \$9.16M O&M a static figure that is more of an assertion than a verifiable estimate.

3. Missing Financial Analysis

The public record does not clearly show:

- Annual debt service estimates for the \$550M bond and associated financing assumptions (interest rates, bond terms)
- Cashflow projections for the debt service, O&M projections and how that will impact the Department's annual operating budget for the various financing scenarios
- How the project scope will be split between current ratepayers and new users, what the assumed user increase is over time, and how much revenue this creates.
- Sewer rate impacts over time under various levels of estimated community growth, which should include a "no growth" scenario.
- Affordability analysis for low income households and how much grants and loans are needed to mitigate.

Without these details, neither the Legislature nor the public can fully understand the financial impact.

4. Impact on Other Infrastructure Investments

Spending \$550 million on this one project could make it harder for the County to pay for other important sewer system repairs. Right now, the County is under multiple Consent Orders to fix problems like sewer overflows, over capacity WWTPs, and broken pipes, which all include future large-scale projects (*ie. CSO Abatement, Ley Creek/Liverpool Force Main Replacement, MBLs WWTP Upgrade, and the Freeman Ave Trunk Sewer*). A Financial Capability Assessment (FCA), as detailed in EPA guidance, should be completed to check to see if the community can afford this project and mandated improvements without making sewer bills too expensive.

There is no indication that an FCA has been done or shared it with the public. Without it, we don't know if spending \$550 million now will leave enough money to fix the other issues. By conducting a robust FCA and publicly sharing its findings, the Legislature—and the public—can ensure:

- The project schedule aligns with financial realities.
- Sewer rates remain *reasonable and sustainable*.
- Upcoming investment in other required infrastructure—like aging pipes or other WWTP upgrades—can be completed without overburdening ratepayers.

5. Industrial Facility Overlap

The County is also building an industrial wastewater facility at the same site.

- The record does not explain how shared infrastructure or sequencing risks will be managed.
- We need assurance that municipal ratepayers will not subsidize industrial costs.

What We Request

Before final approval, the record should include:

- A detailed breakdown of the \$550M project cost.
- Financial analyses reviewed by the Legislature (rate models, debt schedules, affordability studies).
- Debt service projections based on actual bond terms.
- Sewer rate impact analysis, including operating cost increases.
- Growth assumptions and how new users will share costs.
- Disclosure of assumptions behind the public claim of \$115 per unit per year.
- Explanation of how cost-sharing will work with the industrial facility.
- A FCA that analyzes how this project affects the County's ability to fund other sewer district infrastructure improvements

Why Transparency Matters

We are not opposing the project. We support investment in wastewater infrastructure and community development. However, approving \$550M in debt without clear financial documentation:

- Limits oversight.
- Risks affordability for ratepayers.
- May compromise future infrastructure needs.

Thank you for the opportunity to submit these comments.

COMMENTS REGARDING special session of the Onondaga County on Monday, December 29, 2025 at 10:30 a.m.

TO: Jamie McNamara, Clerk, Onondaga County Legislature AND all Onondaga County legislators

FROM: Donald J. Hughes, PhD

Re: Costly improvements to Oak Orchard sewage treatment plant.

Date: December 28, 2025

I have lived in Onondaga County since the fall of 1985. I have training in wastewater engineering and environmental chemistry. I offer these comments as a private citizen who is concerned about both the environmental and economic consequences of issuing bonds to expand the Oak Orchard sewage facility.

The Onondaga County Dept of Water Environment Protection is proposing to overhaul and upgrade the Oak Orchard sewage treatment plant (STP) in Clay, NY. As described in the ADOPTED CAPITAL IMPROVEMENT PLAN, 2026 – 2031, “The project will increase the municipal wastewater treatment capacity to accommodate projected future service area growth and the addition of biosolids processing, industrial wastewater treatment and reclaimed water supply.” (See attached excerpt from the Capital Improvement Plan.)

The County Legislature is being asked to pass a special Bond Resolution of \$515 million to support the Oak Orchard STP upgrade. Specifically the Resolution proposes “the Issuance of \$515,000,000 Bonds of the County of Onondaga, New York, to Pay Costs of Improvements for the Onondaga County Sanitary District. **I urge all members of the County Legislature to VOTE AGAINST this Resolution**, for the following reasons:

1) A complete lack of transparency and opportunity for public engagement

This project is the most expensive endeavor ever contemplated by the county, surpassing the \$164 million Waste-to-Energy plant constructed in the 1990s, and the \$200+M improvements to the county’s Metropolitan Syracuse STP in the mid-2000s. While those projects were vetted with numerous opportunities for public input, this Oak Orchard project has been cloaked in secrecy, with no opportunity for the public to comment. One 5-minute information session was conducted on Nov. 5, 2025 at the Onondaga

County legislative chambers, with little description of the project. And no public information meetings were conducted by the state Department of Environmental Conservation, which has already drafted permits for the expanded plant.

2) Inadequate supporting documentation

The legislators were provided with an information packet on November 5th which describes, in minimal detail, the scope of the project. Three components are listed:

1. OOWWTP Upgrade, which “improve OOWWTP's ability to treat higher flows of sanitary wastewater associated with anticipated development within the Oak Orchard Service Area to the effluent quality required.”

2. a new Biosolids Facility, (“will provide treatment with anaerobic digestion”) and

3. OOWWTP Bridging Project (“Interim improvements to OOWWTP are required to provide continuous SPDES compliance during construction phases...”)

No breakdown of costs is provided; the report gives only a sum total of \$549.5 million. The engineering firms hired by the county—Carollo Engineers and Brown & Caldwell—must have prepared cost estimates upon which the project total cost is based. One would expect that the county Dept. of Water Environment Protection to have received such documentation of costs. Why is this information being withheld from the public and from members of the legislature?

3) A major wastewater process has been omitted from the project description

In a report filed with the NYSDEC on behalf of Onondaga County, Brown & Caldwell (October 10, 2025) “Oak Orchard WWTP Minor Facility Registration Application,” the county’s engineers identified the following as a significant part of the Oak Orchard upgrade:

8. New water reuse facility with ultra filtration and reverse osmosis.

These technologies are included to provide Micron with extra-clean water for re-use in their industrial process. (The county will be building pipes to carry

wastewater from Micron to Oak Orchard, and clean, treated water back to Micron at the White Pine Commerce Park. That's the \$3.5 M pump station and force main project.)

If one digs deeper into Brown & Caldwell and Carollo's engineering reports, one finds two startling pieces of information. First, the immense size of the reuse treatment system: designed to handle 2 million gallons per day (mgd), later expanded to 4 (mgd). It consists of 35 membrane pressure vessels and several stages of pumps and controls. Since the process is very energy intensive, additional power must be brought to the site.

Second, buried at the end of the November 2025 Carollo Engineering report (Table 1, p.1189), one finds a preliminary capital cost for expanding the Oak Orchard municipal WWTP: \$145 million. **This leaves \$400 million unaccounted for.** How much of the missing \$400 million is for this reuse system?

4) Micron Technologies should be required to pay its fair share.

The water reuse system is being installed purely for the benefit of Micron. Engineering documents, apparently not provided to county legislators, indicate that 2-4 million gallons per day of wastewater will undergo extra treatment at new facilities constructed at Oak Orchard. So it should shoulder the cost of building the reuse facility. The company is getting close to \$25 billion in federal and state tax breaks and grants, and has made a record \$8.5 billion in profits in the past three months. Certainly Micron can afford it.

5) This bond will put an undue burden on the residents of Onondaga County.

Most people living in Onondaga County rely on the sewer system. The current sewer use charge is ~ \$457/year per household. According to the November 5th information packet, the projected increase in sewer use rates due to the \$549.5 million Oak Orchard project will be about \$240/yr per household, including operating expenses:

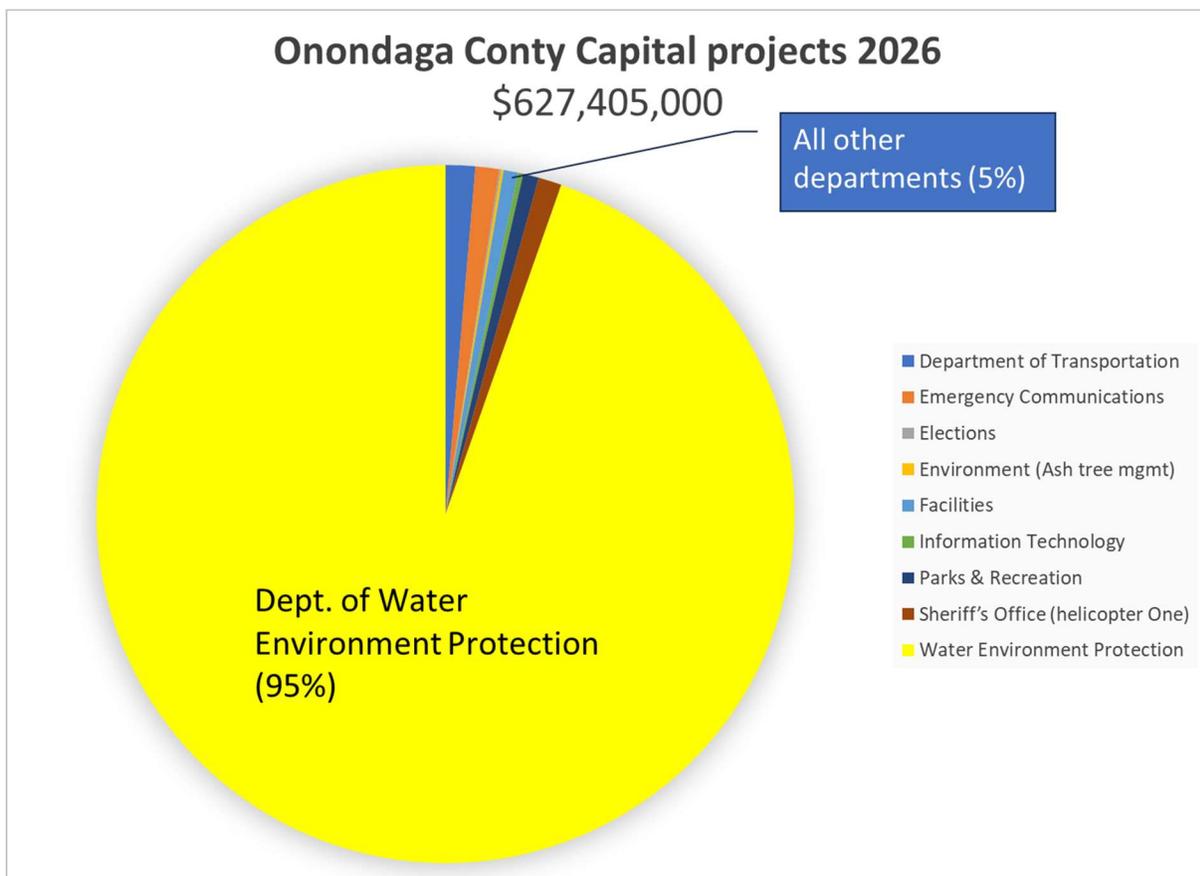
Table 2 User Impact Summary

Funding Source	Value
Annual Debt Service ⁽¹⁾	\$38,765,000
Annual O&M Cost	\$9,160,000
Annual Impact to Operating Budget	\$47,925,000 per year
User Rate Increase	\$239.62/unit-year

Notes:

(1) Annual debt service based on original loan value of \$515,000,000, 20-year bond duration, and interest of 4.4% APY (based on market rate for AAA bonds on, 2025)

Thus, bringing the future sewer use to almost \$700/yr per household. This may be unaffordable in many low-income areas.



6) The proposed designs do not treat PFAS

In my review of engineering reports for this facility, I found one reference to PFAS, the so-called “forever chemicals” which are highly toxic, and which the semiconductor industry says they must use in their manufacturing processes: there is an admission that digestion processes used to process sewage sludge “may transform some per-and polyfluoroalkyl substances (PFAS) to other PFAS, but they do not destroy PFAS.”

So, if this project is funded as proposed, the county will be getting wastewater from Micron that is contaminated with PFAS compounds, and those compounds will either be discharged into the Oneida River, or they will be concentrated into the sewage biosolids. The net effect is that the county will be liable for the resulting PFAS contamination of the environment, whether it is fish in the river, or groundwater at a biosolids disposal site, or the drinking water that OCWA pumps out of Lake Ontario.

Finally, I must point out that the WEP capital improvements for 2026 dwarfs all other capital projects being considered by Onondaga County (see figure below). The expansion of Oak Orchard accounts for 87% of the entire WEP capital budget. Put another way, \$82 out of every \$100 spent on all county capital projects will be siphoned off into the Oak Orchard STP upgrade. For this reason alone, the Oak Orchard proposed bond of \$515 M deserves special scrutiny; a vote on this project must be delayed to 2026 after more details concerning this endeavor have been revealed to the public and their representatives on the legislature.

Thank you for fully considering these comments.

Respectfully,

A handwritten signature in black ink, appearing to read "Don Hughes", on a light-colored background.

Donald J. Hughes

157 Strong Ave, Syracuse NY 13210

dhughes171@gmail.com

Attachments: Excerpts from Capital Improvement Plan, 2026 – 2031

1) pp 157-158:

CAPITAL PROJECTS

Oak Orchard Municipal Expansion

Department: Water Environment Protection (WEP)
Project Type: Renovations & Upgrades
Project Status: Ongoing
Budget Status: Partially Authorized
Phase Status: Design/Engineering



Summary

This project is for a large-scale upgrade to the Oak Orchard Wastewater Treatment Plant in the Town of Clay, NY. The current plant is nearing capacity and limits possibilities for economic growth. The project will increase the municipal wastewater treatment capacity to accommodate projected future service area growth and the addition of biosolids processing, industrial wastewater treatment and reclaimed water supply. The project is necessary for the development of the White Pine Business Park and other economic development opportunities in the Oak Orchard WWTP service area.

Spending Plan (000's)

Funding Source	Prior	2026	2027	2028	2029	2030	2031	6-Year	Total
Authorized Borrowing	30,000	-	-	-	-	-	-	-	30,000
Borrowing to Authorize	-	115,000	150,000	250,000	-	-	-	515,000	515,000
Cash for Capital	-	4,500	-	-	-	-	-	4,500	4,500
Total	-	119,500	150,000	280,000	-	-	-	519,500	549,500

Scope & Details

The Oak Orchard WWTP was built circa 1980 for an average daily design flow of 10 million gallons per day. The plant has some capacity to accept new wastewater flows and loads but on a limited scale. To prepare for future growth from residential, commercial, and industries, expansion of plant capacity is necessary.

An engineering consultant was hired in 2019 to study a variety of flow contribution/input scenarios and identify the corresponding upgrades that would be necessary at the treatment plant. The engineering and construction costs estimates were presented in the Oak Orchard Wastewater Treatment Plant Facilities Plan and Feasibility Study dated February 2021.

The project will increase the municipal wastewater treatment capacity to accommodate projected service area growth from both residential and commercial users. Work on this expansion is necessary for the development of the White Pine Business Park and other economic development opportunities in the area serviced by Oak Orchard WWTP.

In February 2022 the Legislature authorized resolution 2022-028 for \$30 million in borrowing to finance Engineering Services of the Oak Orchard Wastewater Treatment Plant (WWTP) Expansion project. Specifically, a major plant expansion to accommodate the anticipated higher flows and loads associated with the White Pines Development and corresponding commercial and residential growth within the Oak Orchard Service Area.

CAPITAL PROJECTS

After initial consultation and a review of engineering/construction needs, the project was refined to focus on the municipal piece of the expansion with an updated scope, timeline and dollar amount.

Phase I - Engineering/Design & Pilot

- Preliminary consultation and engineering review (\$30,000,000 already authorized)
- Site preparation and asset relocation (\$2,000,000 cash)
- Engineering for municipal service expansion (\$114,000,000)
- Engineering for the power/gas components (\$400,000)
- Construction of Long-Term Rental & Operation of Pilot Equipment (\$600,000)

In late 2025 we intend to seek legislative authorization for \$515 million to finance the full scope of the project and initiate phase 1 to reduce potential delays and cost increases to the construction phases.

2) Summary of WEP projects:

SPECIAL FUNDS	\$780,223,016
Sewer Fund	\$780,223,016
Water Environment Protection	\$780,223,016
Baldwinsville-Seneca Knolls & Oak Orchard Oxygen System	\$20,000,000
Comprehensive Asset Renewal at Baldwinsville-Seneca Knolls WWTP	\$4,786,000
Comprehensive Asset Renewal at Brewerton WWTP	\$8,500,000
Comprehensive Asset Renewal at Meadowbrook-Limestone WWTP	\$11,177,000
Comprehensive Asset Renewal at Metro WWTP	\$5,400,000
Comprehensive Asset Renewal at Wetzel Road WWTP	\$9,650,000
Davis Rd Pump Station & Force Main Improvements	\$7,000,000
Department-Wide Building & Site Improvements	\$12,349,000
Department-Wide Mechanical, Electrical & Process Improvements	\$11,820,000
Harbor Brook Culvert & Channel Improvements	\$1,500,000
Meadowbrook-Limestone & Brewerton Drum Replacement	\$16,500,000
Meadowbrook-Limestone WWTP Inflow & Infiltration Abatement	\$4,404,678
Meadowbrook-Limestone WWTP Large Scale Upgrade	\$5,100,000
Metro WWTP 1978 Plant Annex Asset Renewal	\$2,000,000
Oak Orchard Municipal Expansion	\$519,500,000
Sewer Consolidation	\$76,000,000
Storm Hazard Mitigation	\$136,338
Velasko Road Dam Repairs & Improvements	\$1,150,000
Wastewater Transportation System Improvements	\$89,750,000
White Pine Pump Station & Force Main	\$3,500,000

Date: Dec. 28, 2025

From: Peter King, Syracuse resident, Onondaga County.

To: Onondaga Legislature

Re: Resolution approving "Oak Orchard Municipal Expansion Project, at a maximum estimated cost of \$549"

The Onondaga County Legislature is proposing approving this large infrastructural project, possibly the most expensive the County has ever undertaken.

However, we 'the public' have not been duly invited to comment, at a time either convenient or practical for most to attend.

The overall comment period on this question has been incredibly short. Most critically, some pivotal information is lacking here.

We know some substantial part of this sewage treatment upgrade is specifically being built for Micron.

How much of this project will Micron directly benefit from, even as a 'temporary bridge' while they build their own wastewater treatment facility?

What assurances exist that this expensive treatment upgrade will truly handle potentially highly toxic, persistent compounds such as fluorine and PFAS, as produced by Micron?

What assurances exist that this Wastewater Treatment Plant will be immune from flooding and soil movements, as we can see happening more frequently from Climate Change extremes? For example, clearly the recent Onondaga County Water Authority (OCWA) is experiencing large-volume pipe break issues from soil movements likely induced by freeze-thaw and dry-wet extremes. In recent years, the County's Water Environmental Protection (WEP) has been increasingly fined by NYS-DEC for Infiltration and Inflow (I&I) and Combined Sewer Overflow (CSO) contamination issues. The Oneida River has clearly seen flooding before, as well-documented in the County's previous hazard mitigation plans. Flooding risks are not projected to decrease, but increase.

As a taxpayer, I insist on the following.

The County and WEP first need to get their house in order regarding,

- a) serving the current Onondaga Community, then
- b) the details of this upgrade and
- c) Micron.

Micron is a multi-billion dollar corporation making record profits. Micron is also receiving \$25 billion in federal and state tax breaks and grants. Micron can and should be paying for treating their own hazardous effluent, in all cases including any 'bridges' to other treatments.

Micron has delayed their own implementation. There is no current pressing urgency for approving this large upgrade. This matter needs more careful, transparent attention than WEP or the legislature given it.

We 'the public' need to know the detailed rationales for this huge expenditure.

Thank you,
Peter King,
Meadowbrook area, Syracuse, 13224

PUBLIC HEARING COMMENT 12/29 OAK ORCHARD MUNICIPAL EXPANSION PROJECT

MY NAME IS KAREN HAAS AND I AM SPEAKING ON BEHALF OF STERLING WATER STEWARDS, A GRASSROOTS NONPROFIT ORGANIZATION THAT WORKS TO PROTECT OUR DRINKING WATER RESOURCES.

WE IN THE TOWN OF STERLING SHARE THE LAKE ONTARIO WATERSHED WITH ONONDAGA COUNTY. OUR SHARED WATERSHED IS ALREADY POLLUTED WITH LEGACY INDUSTRIAL CONTAMINATION FROM ONONDAGA COUNTY FACTORIES.

THE PROPOSED MICRON FACILITY WILL USE LARGE QUANTITIES OF EXTREMELY TOXIC CHEMICALS THAT COULD KILL OR SICKEN PEOPLE, ANIMALS AND CROPS.

PFAS-TYPE CHEMICALS—THE SO-CALLED “FOREVER CHEMICALS” ARE AMONG THE MANY DANGEROUS CHEMICALS USED FOR MICROCHIP MANUFACTURE.

MICRON ASSERTS THAT ITS WASTEWATER DISCHARGES WILL HAVE NO SIGNIFICANT ENVIRONMENTAL IMPACT, BUT THE TECHNOLOGY THAT WILL BE USED TO PURIFY THE WASTEWATER DISCHARGE HAS NOT BEEN DISCLOSED. “IT’S PROPRIETARY,” THEY TELL US. ALL WE GET IS A “BLACK BOX” AND “TRUST US.’ NEW YORK STATE CURRENTLY DOES NOT HAVE REGULATORY LIMITS ON THE AMOUNT OF PFASes IN WASTEWATER, SO MICRON’S ASSURANCES THAT THEY WILL COMPLY WITH REGULATIONS ARE MEANINGLESS.

THE PUBLIC IS EXPECTED TO TRUST THAT THE **ONONDAGA COUNTY WATER AUTHORITY** WILL MAKE SURE THAT MICRON’S WASTEWATER REMOVES ALL THE CHEMICALS. THAT WOULD BE **THE SAME OCWA** THAT JUST BUILT A NON-FUNCTIONAL, VACANT SLUDGE FACILITY, AND HAD CUSTOMERS IN SIX TOWNSHIPS RATIONING WATER OVER CHRISTMAS DUE TO PIPES THAT BROKE DUE TO SOIL SUBSIDENCE. (PLEASE NOTE THAT THE PROPOSED MICRON SITE HAS MAJOR POTENTIAL SUBSIDENCE ISSUES DUE TO KARSTIC GEOGRAPHY.)

THIS MORNING, THE COUNTY LEGISLATURE PLANS TO VOTE TO APPROVE A MASSIVE HALF-BILLION DOLLAR BOND MEASURE TO IMPROVE THE OAK ORCHARD TREATMENT PLANT, INCLUDING PRODUCTION OF 'ULTRA PURE' RECYCLED WATER FOR MICRON'S USE. **WHY IS THE PUBLIC PAYING FOR THAT?**

THE BOND PROJECT ALSO WILL ENABLE THE COUNTY TO PRODUCE INDUSTRIAL SLUDGE FROM MICRON. **AGAIN: WHY IS THE PUBLIC PAYING FOR THAT?** WE HAVE NO INFORMATION ABOUT HOW THE PFAS AND OTHER CHEMICALS WILL BE SUFFICIENTLY REMOVED FROM THIS WASTE SLUDGE. THE CONTAMINANTS WILL END UP IN THE GROUND—AND THE GROUNDWATER--SOMEWHERE.

ONONDAGA COUNTY RESIDENTS WILL PAY FOR THIS BOND WITH HIGHER SEWER RATES. BUT HAVE HAD VIRTUALLY NO OPPORTUNITY FOR INPUT AND IT IS CLEAR THAT THE LEGISLATORS PLAN TO VOTE THIS THROUGH THREE DAYS BEFORE NEW YEARS AND A NEW LEGISLATIVE SESSION.

IT SEEMS CLEAR THAT THIS LEGISLATURE PRIORITIZES JOBS AND ECONOMIC DEVELOPMENT OVER PROTECTING THE HEALTH AND SAFETY OF RESIDENTS. IF OUR WATER RESOURCES ARE CONTAMINATED AND OUR PEOPLE, ANIMALS AND CROPS SICKENED, SYRACUSE WILL PAY TOO MUCH FOR THOSE JOBS.

My name is Gail Riina. I am writing to express my concern that the proposed bond to expand and improve the facilities of the Onondaga County Sanitary District in said County, consisting of the Oak Orchard Municipal Expansion Project, at a maximum estimated cost of \$549,500,000 is premature. I am chair of Consultancies for Faith Impact Team (FIT), a working group of the Central Crossroads Conference of the Upstate NY Synod of the Evangelical Lutheran Church of America. FIT engages citizens, who are members of faith communities, non-profits and businesses, in efforts to enhance and safeguard the quality of life impacting Central New York through the expansion of advanced manufacturing.

I am concerned that the proposed expansion of Onondaga County's wastewater treatment plant will not be adequate to protect our drinking water. Will the proposed budget for improvements be the last money that will be invested to scrub the PFAS from the water flowing into the Oneida river and ultimately into our household faucets? Will the public be asked to fund another bond next year to strengthen the treatment process? My greatest fear is that improvements funded now will preclude the creation of a more robust system to avoid contaminating our water. We do not want the minimum the law requires, but the county's best efforts to use the latest research to keep our precious commodity of abundant water safe for all who live and work here!

WHAT is the RUSH, now that Micron development is delayed? I will conclude my comments with a quote found on page 2 of the New York State's Department of Environmental Conservation report: A Decade of Progress on PFAS; Summarizing DEC'S continued response, published DECEMBER 2025.

The toxicity and persistence of these compounds in the environment is an evolving challenge. Once released to the environment, PFAS are extremely costly to clean up and remove from drinking water supplies. The infrastructure for treatment and disposal is still evolving. Investigating and cleaning up known PFAS sites that exceed the State's recommended exposure thresholds will cost billions of dollars and take decades to complete.

Notice of Public Hearing

In person Meeting Time: 10:30 AM

Location: Legislative Chambers in the County Court House

401 Montgomery Street, Room 407

Syracuse, NY

Re: Resolution 197, call for County Legislature Special Meeting, OOWWTP upgrades

Background: Onondaga County Department Water Environment Protection (OCDWEP) is seeking authorization of \$515 million for a combined total of \$549.5 million in funding for OOWWTP upgrades. Following are my questions, comments and concerns.

1. What is the detailed breakdown of the capital and O&M costs for the Oak Orchard WWTP upgrades? The cost estimates provided in Appendix I of the Engineering Report dated November 2025^{Note 1} include costs much lower than \$515 million dollars and were in the range of ~\$145 million dollars for the municipal upgrades. It is noted the estimates by the engineering firm GHD stated an accuracy of +/- 40% on the cost (ref page 1186 of the same Engineering Report, November 11, 2025^{Note 1}). These costs are preliminary! It seems premature to seek authorization for funding for the total amount at this early stage.
2. Another specific question is regarding the costs for the water reuse facility (WRF). Are the costs for that facility included in the OOWWTP upgrades? I ask because the WRF will produce Ultra Pure Water (UPW) that Micron will need for their operations. The WRF capital and O&M costs for operation should be borne by Micron (or other industries) using the UPW water. Please confirm.
3. With the engineering design proceeding in phased steps, would it not be better to approve the funds as the project progresses through the phases? Approving the funds as the phases progress would provide more transparency to the public on the project plans overall and would provide more accurate cost estimates. The projected 50% increase in County Sewer tax cost of ~\$240.00 is a significant cost increase to pass on to the residents of Onondaga County.
4. There are concerns about "forever chemicals" with the semi-conductor industry waste. What are the steps in the process to ensure the PFAS compounds are being separated and destructed to prevent any "new source" of PFAS from discharging into the environment?

Reference Note 1. 'Engineering Report' refers to SPDES NUMBER: NY-0030317 OOWWTP Expansion Program Basis of Design/DEC Engineering Report Final/November 2025.

Respectfully,



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