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February 17, 2026 Public Hearing OAK ORCHARD INDUSTRIAL SEWER DISTRICT

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"We believe"

- City DOT w/ NO good news

Micron Sustainability Challenges and Concerns

By John Przepiora, PE, President, GreeningUSA

February 16, 2026

Public Safety
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Response times

What follows is an overview of some of the most serious sustainability concerns and questions relating to the Micron development.

1. Inherent in semi-conductor manufacturing development are serious health, safety and economic and environmental justice concerns. These concerns range for the use and disposal of hazardous materials to the inequitable distribution of employment benefits and the widening of the income inequality gap in a community that now will have many high paying jobs and only little trickle down effect to those ill equipped to be employed in a field that values high technology skills and competencies. **And while much effort seems to be paid to creating the school to jobs pipeline, much more needs to be done to guarantee good jobs in an equitable manner.** The web site [CNY United for Community Benefits](#) summarizes these overarching concerns and categorizes them into three broad areas:
- Job Access, Workforce Development, and an Equitable & Safe Workplace.
 - Housing and Transportation Justice and Equity.
 - Public Health and Safety, Environmental Health, and Resource Justice.

Rather than restate the views included in this Community Benefits Platform please visit: [CNY United for Community Benefits](#) or use the following QR code.



2. The environmental and health impacts posed by Micron's production process, which relies on highly toxic chemicals including the per- and polyfluorinated compounds, the so called forever chemicals, is perhaps the biggest public and environmental health concern posed by the project. The main question is: **What are Onondaga county and Micron doing to keep PFAS out of our air, water and landscape?**

3. The population growth which is estimated to increase by 60,000 people and nearly 30,000 new households will increase the cost of living and exacerbate income inequality commonly associated with technology based economic development. The energy chip fabs require will increase electric utility costs for all and water usage by Micron will likely will cause an increase in water rates as well, and require very costly wastewater treatment which will burden Onondaga County residents to Micron's benefit. **The cost of living will increase dramatically for central New York residents. What is being done to keep household costs affordable and prevent the rise of homelessness?**

4. Why is Micron being allowed to come to NY and dramatically create a tremendous amount of greenhouse gas emissions which are detrimental to NYS's climate mitigation plans as well as the health of residents? **Also, what construction practices, such as low carbon concrete and steel, will be used to reduce imbedded GHG? Why are 12,000 parking spaces being built in lieu of creating a public transportation system that is more energy efficient and reduces traffic congestion?**

5. The local impacts of transforming Clay, NY will be dramatic for Clay residents. Not only will the effects of increased traffic and noise be dramatic, there is likely to be a significant heat island effect that will raise the local area temperatures and cause additional need for higher energy use for summer cooling. **What is being done to minimize the local area temperature rise and other nuisance impacts local residents will likely experience?**

6. Related to the household growth is the need for growth in municipal services. It is unclear whether municipalities will generate enough tax revenue needed to fund the increase in service demand for regular services such as police, fire, sanitation and highway and street maintenance, without raising taxes on existing residents. **What is being done to smartly manage the household growth and the cost of municipal services? Will existing residents be held harmless in the face of growth Micron's project will induce?**

7. The increase in wastewater treatment cost is a case in point which Onondaga County directly controls. The proposed expansion and upgrade of the Oak Orchard WWTP reportedly may increase the unit charge by upwards of 50%. At the same time the OOWWTP phase 1 project appears to include improvements and costs which solely benefit the Micron factory, such as the improvements needed to create

a reuse and recycled water process, and reconfiguration of the existing OOWWTP to make room for the industrial WWTP. **It is incumbent on the County officials to disclose and explain whether there are processes and expenses planned to be part of the phase 1 OOWWTP upgrade that solely benefit Micron and/or other industrial users and that are over and above the needed wastewater treatment needs of residential and commercial properties. We should not be attracting Micron to Onondaga County on the backs of existing residents.**

8. While it is laudable that Onondaga County is proposing a dedicated industrial WW District to pay for construction, operation and maintenance of facilities to handle and treat the industrial wastewater from the White Pine Development, approval of such a financing mechanism should be held until much more information is known about what facilities and related capital, operating and maintenance costs are estimated and fully disclosed. **The public deserves to know whether proposed treatment will protect the environment from the various hazardous chemicals which are inherent in semi-conductor manufacturing. The public also deserves to know what debt and operating costs the county will be assuming; and what costs will be assessed to the industrial users of the systems.** There are serious risks of IWWTP undertaking which has been estimated to have a construction cost of between \$2 billion and \$3 billion. **What if industrial rate payers fail to pay expected fees and revenue doesn't offset costs? And, what about environmental risk that Onondaga County is shouldering? What protections are in place, or proposed, to hold harmless the county and its residents from a potential environmental and financial disaster?**

9. Routine monitoring of our air and water is necessary due to discharges which the Micron development and the connected actions (e.g., wastewater treatment) will release to the water and the air. **Will the protections and monitoring being required by the NYSDEC be sufficient to protect the people and environment from hazardous wastes?** It is presently unclear how the proposed wastewater projects will prevent PFAS and other highly hazardous chemicals from harming our water and the health of the community. **WEP and Micron need to be clearer about what their plans are before agreeing to spend billions to upgrade treatment facilities.** The same must be said about air emissions. Micron and NYSDEC should be asked to explain in plain language exactly what will be coming from the fabs. **The advice of third party, independent experts should be sought to assess what is being said. The public must know what monitoring will regularly be done under the existing permit requirements and what more is needed beyond permit**

requirements. All routine monitoring results must be publically available and a comprehensive environmental oversight program that includes independent experts and other stakeholders should be created.

10. To a significant degree the recommended due diligence with respect to hazardous pollutants must also be applied to the financial resources which are being spent to serve Micron's needs and the community's needs in the face of this transformational industrialization of the northern suburbs. Not only must care be taken to openly examine the costs and fiscal implications of the proposed Oak Orchard projects, but a thorough understanding of the fiscal implication of all impacted community services must be achieved. **What will it mean for police and fire services when 4,000 construction workers arrive? Will the Sherrif's department and other police agencies be able to handle the potential increase in criminal activity as well as the traffic related impacts?** It may be prudent to engage the services of an independent fiscal watchdog to avoid unintended adverse financial impacts.
11. OCIDA has proposed (approved?) granting Micron significant property tax exemptions for 49 years though it never was made clear whether the net increase in municipal property taxes will cover the service needs and prevent a rising property tax burden on County residents and businesses. **It is necessary for OCIDA and Micron to explain why the proposed project approval and OCIDA resolution agreeing to the PILOT agreement requires just 4,500 fab jobs when it has been widely publicized Micron's fabs, when completed, will result in 9,000 factory jobs in Onondaga County.**
12. Finally, solving these sustainability problems cannot be done in a vacuum of back room politics and deal making. To date this development has been devoid of a robust public engagement over the environmental and equity challenges posed. While OCIDA and NYS have utilized existing regulatory requirements to obtain citizen input, the effort has been marginal at best. The public deserves more involvement and interaction with our governmental leaders and even with Micron's executives to truly partner with the residents of Onondaga County and to work toward developing the objectives of Onondaga County in a sustainable manner in order to avoid chaos, calamity, environmental harm to our land, water and air, and unsustainable use of our fiscal and human capacity.

MICRON

Micron's industrial waste: Costs soar for treatment plant as critics point to little environmental review

Updated: Jan. 07, 2026, 6:39 p.m. | Published: Jan. 07, 2026, 6:00 a.m.



Onondaga County plans to upgrade the Oak Orchard Wastewater Treatment Plant in Clay to accommodate business and residential growth, and build an industrial wastewater plant for Micron Technology just north of the sewage plant. The industrial plant would be built at the top right of this photo, where a solar panel array now stands. Onondaga County



Syracuse, N.Y. – Onondaga County’s proposed industrial wastewater plant for Micron Technology could cost three to five times more than original estimates, according to consultants working for the county.

The estimated cost of the industrial plant has ballooned rapidly. In May 2024, County Executive Ryan McMahon told [syracuse.com](https://www.syracuse.com) that the county would spend about \$500 million to build the industrial wastewater treatment plant for Micron.

Now the county’s own consultants calculate the price tag between \$1.4 billion and \$2.6 billion, numbers McMahon recently said were based on worst-case scenarios rather than likely outcomes. Still, that’s the construction estimate by professional consultants to treat the water from the first two of four factories Micron plans to build.

The treatment plant in Clay would be the single most expensive project the county has ever undertaken, potentially costing more than the county’s decades-long cleanup of Onondaga Lake.

The treatment plant is the final safeguard to keep chemicals in Micron’s toxic process wastewater from entering the Oneida River. Yet critics say the county is forging ahead without enough independent environmental review of the plant’s potential impacts.

The treatment plant, like several other utility projects critical for Micron’s operations, was lumped into the 20,000-page environmental impact study of Micron’s main campus. But unlike those other projects, this plant won’t undergo a separate, public review by state or federal regulators.

Environmentalists say the wastewater plant needs a specific and more detailed public review of its own.

The industrial treatment plant is a crucial component toward Micron’s promise to produce millions of computer memory chips each day. The plant would be the last chance to prevent the industrial pollution, including the use of “forever chemicals” ubiquitous in the chipmaking industry, from ultimately reaching Lake Ontario.

Making those tiny chips that run modern electronic devices takes a secretive combination of dozens of chemicals, formulas heavily protected by businesses and laws. Some of those chemicals are toxic heavy metals. Some are a class of chemicals called PFAS, which are toxic and don’t break down in the environment.

Micron's industrial waste: Costs soar for treatment ... <https://www.syracuse.com/micron/2026/01/microns-...>
After the chips are made, Micron has to dispose of the leftover chemicals, waste that can't be reused but remains toxic. The treatment plant is meant to turn that industrial wastewater into something safe enough to discharge into the Oneida River.

The plant would handle about 16.5 million gallons of Micron factory wastewater every day. That's from the first two chip factories; the treatment plant could ultimately handle 42 million gallons of industrial wastewater per day if Micron builds all four.

Here's what we know, and what some critics are saying.

Who pays?

In mid-2024, McMahon said the treatment plant would cost \$500 million. McMahon has this year started using a figure twice that high: \$1 billion.

Earlier this month, in an interview with [syracuse.com](https://www.syracuse.com), McMahon dismissed the consultants' estimates as speculative and worst-case.

"I continue to use the billion-dollar number is because that's going to be the number," McMahon said. "Under no circumstances can there be a \$2.7 billion industrial project or else there just won't be a project. That's just a fact."

The consultants, Brown and Caldwell, are "part of the county's program management team" for the proposed expansion, the county said in August.

Brown and Caldwell, an engineering firm with offices in DeWitt, did not return phone calls seeking comment.

The county has sometimes evaded questions about the ballooning price tag for the industrial plant. When asked at a Nov. 17 public hearing if the county had a cost estimate for the project, Deputy County Executive Cydney Johnson replied, "Not yet."

That was two months after the county had submitted its application containing the consultant estimates.

No matter what the final costs, it's still not clear how much Micron would pay, or when. The county plans to build the plant and borrow money to finance the construction.

McMahon has said repeatedly, including to [syracuse.com](https://www.syracuse.com) in December, that Micron will reimburse the county through user fees once the factories and plant start operating.

McMahon said the county is negotiating with Micron but no agreement has been signed yet. 1/19/26 8:50 PM

Micron's industrial waste: Costs soar for treatment ...
He said work won't start until that deal is done.

<https://www.syracuse.com/micron/2026/01/microns-...>

The county plans to establish an industrial district that includes Micron and the county's planned industrial park for suppliers, just south of Route 31. Only the users in that district would be required to pay for the plant.

The county will hold a public hearing on establishing that district at 9:30 a.m. Thursday at the Department of Water Environment Protection offices, 650 Hiawatha Boulevard W., Syracuse. The hearing will be in the 3rd floor conference room.

Critics: Project needs better review

Environmentalists say the industrial plant, which would process Micron's contaminated wastewater and discharge the effluent into the Oneida River, should face greater environmental scrutiny.

The plant was included as one of four "connected actions" in the 20,000-page county and federal environmental review of Micron's overall chipmaking project. The public had just 45 days and one public hearing to digest that report and comment on everything from traffic to air pollution to greenhouse gas emissions.

That massive report studied the impacts of the entire Micron development, which would someday be three times the size of the New York State Fairgrounds and consume more water than the entire city of Syracuse.

Burying the only environmental review of the industrial treatment plant into that larger study isn't sufficient, said Don Hughes, an environmental consultant and activist.

Hughes said the Micron report didn't delve deep enough into how the county would protect the environment from the toxic chemicals and sludge that the Micron factories would generate.

"They should do an environmental impact statement because this is an expensive and complicated process, and there's going to be a lot of chemicals coming down the pipe at this plant," Hughes said. "We have to get an understanding of what they are and how effective the treatment will be."

An environmental impact statement on a proposed treatment plant would require months of study on what effect the construction and operation of the plant would have on the environment. The county would have to prepare a report and give the public at least 30 days to comment.

But the other is a massive, \$549 million undertaking.

That's the expansion of Oak Orchard, a municipal treatment plant that already treats the water coming from toilets and kitchen sinks in the village of North Syracuse and portions of Clay and Cicero. Planning for the Oak Orchard expansion started in 2021.

The county says the municipal expansion and the new industrial plant are two separate projects.

But, in paperwork to the state, the county is also lumping them together to get through the regulatory approval process. That, again, means this industrial plant that treats Micron's industrial waste is removed from a separate layer of public scrutiny that environmental advocates say is needed.

The municipal expansion would increase the sewage treatment capacity from 10 million to 15 million gallons of sewage a day, according to the county's permit application with the state. The expansion would include a water recycling facility to send some water back to Micron for reuse in cooling towers and chipmaking processes.

The environmental review of that municipal expansion was rushed through the county Legislature in October.

McMahon's office provided the Legislature's Environmental Protection Committee with a 414-page report three days before a hastily called committee meeting. At that Oct. 7 meeting, Johnson, McMahon's deputy, pressed the committee to accept the report, which formally declared that the plant expansion would have no significant environmental impact.

Then-committee Chair Julie Abbott, a Republican like McMahon, refused to call a vote on the report because legislators hadn't had enough time to thoroughly review it. At the full Legislature meeting one week later, on Oct. 14, Abbott complained about the rushed process but voted to approve the report anyway.

"This came to us last-minute," Abbott said. "414-plus pages were dropped on our desk."

Abbott, who lost re-election in November, started a part-time job on Jan. 1 with the county's wastewater department.

Despite the late notice, the legislature voted 14 to 2 to approve what's called a negative declaration, asserting that the Oak Orchard expansion would have no harmful environmental impacts.

The final environmental report on the entire Micron project was issued by the Onondaga County Industrial Development Agency on Nov. 7, and the county formally approved the Micron project on Nov. 18. Now Micron is waiting on federal approval of the report and the issuance of government permits to start work.

McMahon said the county was legally required to include the wastewater plant in the larger Micron report because the plant is essential to the Micron project. The state's environmental law forbids "segmentation," or breaking up a big project into smaller pieces, which could make the overall environmental impacts appear smaller, McMahon said.

Of the four connected actions, the county's industrial wastewater plant has the greatest potential for long-lasting environmental harm. Yet critics said the plant will receive the least amount of scrutiny by regulators and the public.

Each of the other three projects listed as connected actions have or will undergo additional environmental review than that contained in the overall Micron report.

For example, National Grid has filed thousands of pages of documents with the Public Service Commission for the utility's plan to bury eight high-voltage power lines under Caughdenoy Road to the Micron campus. Those documents included detailed environmental reviews that were not contained in the overall Micron environmental report.

National Grid's proposed natural gas line for Micron has faced similar PSC scrutiny.

The fourth connected action, the Onondaga County Water Authority's proposal to bring water to Micron via a new, 26-mile water line, has been the subject of thousands of pages of review, and needs the scrutiny of the DEC and a joint Canada-U.S. commission that oversees Great Lakes water withdrawals.

The county should conduct a more substantial and transparent review of the industrial plant, said John Przepiora, president of Greening USA.

"The county should hold real public information meetings and allow the public to ask questions and get this stuff clarified in the mind of the public," Przepiora said.

2 wastewater projects

The county is undertaking two wastewater treatment plant projects in Clay, both connected to Micron.

The industrial treatment plant is the bigger project.

On Dec. 29, just three days before Democrats took control of the county Legislature for the first time in nearly 50 years, all Republicans voted to borrow \$549 million to build the municipal plant. The vote was 12-5.



Onondaga County plans to upgrade the Oak Orchard Wastewater Treatment Plant in Clay (outlined in red) to accommodate business and residential growth. The county also plans to build an industrial wastewater plant for Micron Technology just north of the sewage plant. The industrial plant would be built at the top right of this photo, where a solar panel array now stands. Onondaga County

Landowners worry about pipes

The state environmental permit paving the way for Micron's industrial treatment plant also covers the underground industrial wastewater lines that would run for about two miles, from the Micron campus on Caughdenoy Road to the new industrial treatment plant. Three 30-inch diameter lines would carry wastewater from Micron to the industrial plant. Four 36-inch lines would return cleaned water from the plant to Micron.

Micron has acquired the rights of way for all but about 2,000 feet of that two-mile path. OCIDA has launched eminent domain proceedings to get easements for the last 2,000 feet, owned by a company called SSO Holdings.

The owners of SSO, developers John Russo and Joe Grosso, would still own the property next to the Oak Orchard site but would be limited on what they could build above the underground lines.

Russo and Grosso have refused to accept Micron's offers to buy the easement rights. The two men told [syracuse.com](https://www.syracuse.com) last year they're concerned about chemicals leaking into the 76-acre property that holds a pond where they take their grandchildren fishing.

At a public hearing on the eminent domain proceeding Nov. 20, Russo's son, J.P. Russo, said the county hasn't done the environmental study required by state law. He argued that the potential impact of the underground lines was, like the industrial plant itself, studied only in context of the bigger Micron project.

"Before any property can be taken by eminent domain, the law requires a full and fair review of the potential environmental impacts," J.P. Russo said. "Yet the environmental analysis of that pipeline is incomplete, segmented and lacking detail."

OCIDA's next step is to ask a judge to force Grosso and Russo to allow the pipes to be buried on their land. The judge would determine how much compensation OCIDA owes them.

READ MORE ABOUT MICRON TECHNOLOGY IN CLAY

Micron groundbreaking: the start of something big for CNY (Editorial Board Opinion)

6 takeaways from Micron's long-awaited groundbreaking: 'a turning point for Central NY'

Micron breaks ground on massive chipmaking plant that could transform Central NY

The essential guide to Micron's chip project in Upstate NY: Timeline, hiring, construction and costs

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1 of 6

Which of the following best describes how you feel about the U.S. Immigration and Customs Enforcement agency known as ICE?

- They should be defunded and abolished
- They are important but require reform
- They are a high-performing unit doing an important job

Next

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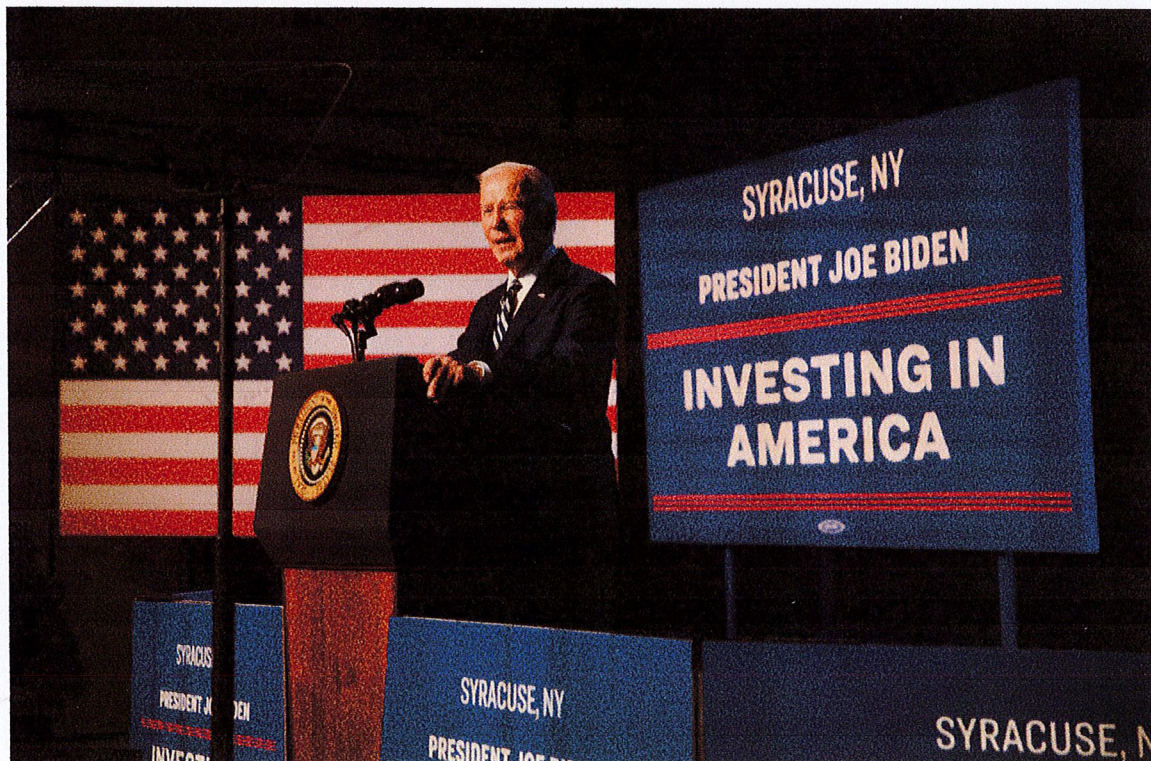


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BUSINESS

Micron is getting billions more in taxpayer money than anyone is talking about

Updated: May. 15, 2024, 10:12 a.m. | Published: May. 14, 2024, 6:00 a.m.



In a visit to Syracuse last month, President Joe Biden announced that Micron Technology would get up to \$6.1 billion in grants to build chipmaking factories in Central New York and Idaho. Biden did not mention a federal tax credit that would give Micron a much bigger taxpayer subsidy. (N. Scott Trimble | strimble@syracuse.com) N. Scott Trimble | strimble@syracuse.com



Syracuse, N.Y. -- When President Joe Biden came to Syracuse last month, he announced that Micron Technology would get a \$6.1 billion grant to build semiconductor plants in Central New York and Idaho.

But the total taxpayer subsidy for Micron for building two plants in Clay and one in Boise could be more than three times that high.

Micron's potential subsidies could be more than \$20 billion, from a combination of federal, state and local incentives. Some of that money would come from direct government payments, like the CHIPS Act grant Biden touted.

The sweetest slice of the subsidy pie, however, would be a little-discussed provision of the CHIPS Act called the advanced manufacturing investment credit. That tax credit allows chipmakers like Micron to get back from the government 25% of what they spend on buildings and machines to produce semiconductors, or chips.

Micron says it will spend \$50 billion through 2030 to build and outfit two fabrication plants, or fabs, in the town of Clay and one at its headquarters in Boise, Idaho.

For every dollar Micron spends specifically for chipmaking buildings and equipment, it can get 25 cents back on its taxes. Not all of that spending in Clay and Boise would qualify for the credit, but the vast majority would.

That means the tax credit alone could add up to more than \$10 billion for Micron over the next six years, according to experts and syracuse.com's analysis of publicly available numbers. The credit is the part of the federal effort that few are talking about. Biden never even mentioned the tax credit last month.

The CHIPS grant and tax credit could add up to a \$16 billion federal subsidy for Micron to build the three fabs. The Clay project is much larger and would likely account for most of those subsidies.

It's a lucrative deal for an American company that earned a \$43 billion profit over the past decade by building chips overseas. That gigantic public support is key, national leaders say, to bringing chipmakers like Micron back from Asia to the U.S.

In exchange for that federal taxpayer support, Micron has said it would hire 4,800 people for the first two fabs in Clay and 2,000 in Idaho. That means each of those jobs could cost taxpayers more than \$2 million. Micron has said the average pay for workers in Clay would exceed 5:32 PM

There's another sweetener from the federal government for Micron: up to \$7.5 billion in low-interest loans. Micron would have to repay the money, but the company could save undisclosed millions in interest and fees.

The CHIPS grant, tax credit and loan represent only Micron's federal subsidies. Both New York and Idaho are giving Micron big incentives, too.

In New York, Micron could get another \$2 billion to \$3 billion in state investment and job creation credits for the two fabs in Clay. The company could also save several billion dollars in local and state sales taxes, according to county officials.

The incentives are huge, but Micron's impact will be, too. The company's planned projects would be the biggest in the history of both New York and Idaho. The Clay project has the potential to transform Central New York's economic landscape and increase Onondaga County's population by more than 100,000 people. It could have an economic impact of nearly \$17 billion a year, according to a study commissioned by New York state.

While jobs have been a major focus of Micron's announcement to come to Central New York, the CHIPS and Science Act, passed in 2022, is not principally a job creation law.

The larger goal, say Biden, Micron and U.S. Sen. Charles Schumer, is to bring chip plants back from Asia, where government largesse makes production much cheaper than in the U.S.

Schumer and Biden say the U.S. economy and national security depend upon domestic production of memory computer chips, which are the lifeblood of electronic devices from cell phones to jet fighters. Micron is the only U.S. manufacturer of memory chips, and demand is expected to skyrocket along with the boom in artificial intelligence and autonomous vehicles.

What we don't know

The CHIPS Act has been secretive from the start. The law specifically forbids the government from releasing information about company applications. The U.S. Department of Commerce, which is overseeing the \$52 billion CHIPS pool, has said little about the terms of the CHIPS subsidies.

It's also early in the process: The agreements reached with chipmakers for grants are preliminary, and many of the details have yet to be worked out and made public.

Because of that, there's a lot we don't know about Micron's federal subsidy package, including

- Exactly how much Micron would receive from the federal tax credit. While the law puts no cap or timetable on the credit, the Internal Revenue Service has yet to issue final rules. Micron says it “expects to benefit” from the tax credit, but offered no details. Intel, which received the biggest CHIPS grant, offers a clue: The company says it plans to claim \$25 billion in tax credits on its projected \$100 billion in spending over the next five years.
- The terms of Micron’s \$6.1 billion grant award. We don’t know what milestones Micron must meet to get the money.
- The company’s eventual savings from \$7.5 billion in CHIPS Act loans, which could be a combination of lower-than-market interest rates and reduced transaction fees.
- The breakdown of Micron’s \$50 billion in spending between Clay and Boise.

And we might never know the final total Micron receives from the tax credit. The credit would be claimed on Micron’s income tax returns, which are not public. There is no provision in the CHIPS Act that requires public disclosure.



Micron Technology is expected to receive billions of dollars in taxpayer subsidies to build two computer chip fabrication plants, or fabs, on Route 31 in Clay. Rick Moriarty | rmoriarty@syracuse.com Rick Moriarty | rmoriarty@syracuse.com

Building and outfitting fabs are among the most expensive and complex construction projects on the planet. Getting a tax break on building and equipment costs in the 2022 CHIPS and Science Act was a huge win for semiconductor manufacturers.

Chipmakers say it's 30% to 40% cheaper to build and run fabs in other countries, like Taiwan and Singapore.

Schumer has said the tax credit was a late addition to the CHIPS bill that upset some senators, who thought it was too much. But without it, Schumer said, Micron never would have considered coming to White Pine Commerce Park, in Clay.

"Micron was very clear they couldn't invest in the United States, let alone Syracuse, without the CHIPS incentive and the investment tax credit together," said Schumer, the architect of the CHIPS Act.

Micron's executive in charge of building the Clay and Boise fabs agreed.

"It's incredibly important for us to be able to compete on cost with other countries and bring manufacturing back to the U.S.," said Scott Gatzemeier, Micron's corporate vice president for front end U.S. expansion. "We have not been shy about saying we would not be looking to invest in the U.S. if it was not for incentives that make it cost-competitive."

Fifty years ago, 90% of the kind of memory chips Micron specializes in were built in the U.S. Now, Gatzemeier said, just 2% are made here, and all of those are made by Micron in its Virginia fab.

Gatzemeier said the company won't speculate on what the eventual tax break might be, especially because the final IRS regulations have not been released.

Micron originally said fabs 1 and 2 in Clay would open by 2032. That has now been moved up to 2029. The third and fourth fabs would be done by 2041.

How the tax credit works

After a company spends money on chipmaking buildings and equipment, it can deduct 25% of that from its tax return. The tax credit is considered "refundable," which means the company gets the money even if the credit exceeds the company's tax bill. ↩

Offices, parking structures and other non-manufacturing buildings wouldn't qualify for the credit. However, it is much cheaper to build and equip an office than a fab, where individual machines can cost hundreds of millions of dollars

Good Jobs First, a group that tracks government subsidies, estimates that after removing offices and other nonmanufacturing space from the equation, Micron could get \$10 billion from the tax credit.

The other three semiconductor companies that have won big CHIPS grants -- Intel, Samsung and Taiwan Semiconductor Manufacturing Co. -- say they'll apply for the tax credits, too. Those companies and Micron plan a combined \$273 billion in projects; 25% of that would be \$68 billion.

Intel already claimed \$845 million from the credit in 2023, according to the company's annual report. Intel's chief executive officer has said the company plans to claim \$25 billion in tax credits.

Intel's share of the tax credit, let alone credits claimed by all four big chipmakers, would exceed the \$24 billion the Congressional Budget Office estimates will be paid out in tax credits through 2031. Congress has so far allotted \$24 billion. It's not clear what happens if that money runs out and companies keep applying.

There's no limit on how much companies can get in either the CHIPS Act or the Internal Revenue Service draft regulations. There is also no expiration date, although construction must start by end of 2026 to qualify for the credit. Micron says it plans to break ground in Clay in 2025.

Other tax breaks and grants Micron is counting on

This estimated \$10 billion in tax credits is the largest of a lucrative list of public subsidies Micron would receive for the first two Clay fabs.

In addition to the tax credit, and the \$6.1 billion CHIPS Act award, Micron could get billions more in state and local subsidies. That support ranges from lower tax bills to substantial help building the public infrastructure needed to run the massive chipmaking complex.

The biggest of those is the \$2.8 billion from New York state, mostly from the existing Green CHIPS job program, for building the first two fabs. The law rewards the creation of jobs and carbon-neutral emissions. That subsidy comes after Micron creates a certain number of jobs and spends a predetermined amount of money.

Micron could also save \$700 million in discounts on electricity from the New York Power Authority for building the first two Clay fabs.

Micron is getting billions more in taxpayer money t... <https://www.syracuse.com/business/2024/05/micron-...>
New York state has committed to another \$300 million in spending, including \$200 million for roads and other infrastructure improvements around the White Pine Commerce Park in Clay, where Micron plans to build.

Onondaga County is offering its own hefty tax breaks and subsidies. The county plans to spend \$1 billion in wastewater infrastructure, which will include an industrial pretreatment plant on the Micron campus and a massive expansion of the Oak Orchard treatment plant, in Clay, that would serve Micron and the business and residential development expected to follow. Micron will be expected to pay back much of that cost in higher rates.

Micron has applied for local property and school tax breaks from Onondaga County and the Liverpool school district that would total about \$300 million over 49 years. The company would also be exempt from paying sales and use taxes on construction, which could add up to several billion dollars.

Taxpayer subsidies for Micron Technology

This chart shows the estimated public subsidies Micron is expected to receive to build two fabs in Clay and one in Boise, Idaho. Micron will receive billions more from tax breaks in Onondaga County and Idaho, but those total are still unknown.

Source	Amount
CHIPS tax credit	\$10 billion
CHIPS grant	\$6.1 billion
New York state	\$3.5 billion
Onondaga County	\$1.3 billion
Total	\$20.9 billion

Table: Glenn Coin • [Get the data](#) • Created with [Datawrapper](#)

How this package compares

If you ignore the federal money and just count the state and local tax subsidies, Micron is already one of the country's most subsidized projects ever, according to the Good Jobs First database. In raw numbers, the \$6.3 billion already announced that Micron would get from state and local sources would be the second-biggest subsidy on record, the group says. That would be for the full buildout of all four fabs in Clay.

Only Boeing's \$8.7 billion package in 2013 in Washington state was bigger, according to Good Jobs First.

Micron is getting billions more in taxpayer money t... <https://www.syracuse.com/business/2024/05/micron-...>
received in 2007 in New York.

It's hard to compare the federal subsidies because for decades Washington didn't get heavily involved in industrial policy, said Jacob Whiton, a research analyst with Good Jobs First.

We may never know the full number

We might never know the final tax credit Micron receives. The credits would be submitted on Micron's annual tax returns, which, like yours, are private.

The final regulations for the tax break aren't done, Gatzemeier said, so it's possible companies could eventually be required to disclose the amount they received. Neither the CHIPS Act nor the IRS draft regulations require public disclosure.

A 2021 Securities and Exchange Commission rule requires companies to report the aggregate amount received from government subsidies. The rule doesn't require companies to itemize those incentives, however.

In Micron's 2023 annual report, written before Biden's announcement, the company projected it would receive more than \$3 billion in government subsidies worldwide over the next decade. The report did not say what those subsidies were or which governments granted them.

"We also receive a 25% investment tax credit on qualified investments in U.S. semiconductor manufacturing under the CHIPS Act," according to the report, which does not say how much Micron expects to receive.

It doesn't have to be that way. Intel, on its annual reports, breaks out the incentives by location and agency. In 2023, Intel reported that it received a CHIPS investment tax credit of \$845 million. Intel has already started construction on fabs in Ohio and Arizona. GlobalFoundries, in Saratoga County, said in its 2023 annual report that the company filed for a \$66.4 million refund under the CHIPS tax credit.

"You're kind of at the mercy of these companies for the level of information they're willing to provide," Whiton said.

Glenn Coin covers Micron Technology for [syracuse.com/](https://www.syracuse.com/) The Post-Standard. Got a tip, comment or story idea? Contact Glenn at: [email](mailto:glenn.coin@syracuse.com) | 315-470-3251

READ MORE ABOUT MICRON TECHNOLOGY IN CLAY

**CNY's 'Micron moment' calls for collaboration, strategic investment
(Guest Opinion by Steve Gorczynski)**

Lawsuits fly as split between Great Northern Mall's owners and a housing developer turns ugly

County agency buys one more piece of ShoppingTown, but dead mall's future remains uncertain

Clay gets a \$1 million boost to revive its waterfront, a step toward becoming entertainment destination



Glenn Coin

Glenn Coin is the science and technology, weather and environment reporter for [syracuse.com](https://www.syracuse.com) and [The Post-Standard](https://www.poststandard.com). He also covers Micron Technology's plans to build a leading-edge semiconductor plant in Central...more

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MICRON

In less than a month, Micron has cut nearly 300 acres of trees at site in Clay (photos)

Published: Feb. 17, 2026, 6:00 a.m.



A contractor for Micron Technology has cut nearly 300 acres of forest since Jan. 19 on the future Micron campus in the town of Clay. Monday, February 9, 2026 (N. Scott Trimble | strimble@syracuse.com) N. Scott Trimble | strimble@syracuse.com



Clay, N.Y. — Contractors for Micron Technology have cut down nearly 300 acres of trees since work started four weeks ago, according to reports filed with the town.

As of Thursday, Micron had cleared trees from 284 acres, or 86%, of the 330 acres to be cleared by March 31. No trees can be cut between April 1 and Oct. 31 because two species of endangered bats roost there in the warmer months.

The frozen ground and thick snow cover are ideal for cutting trees, said Brian Bender, the town of Clay planning commissioner.

Micron is required by its stormwater management permit to conduct periodic inspections of site work and submit those reports to the town. The inspections are done by McFarland Johnson, a consulting company based in Binghamton, and sent to the town planning department.

While there's no set schedule in the law, Micron has been filing two reports a week since work began on Jan. 19, Bender said.

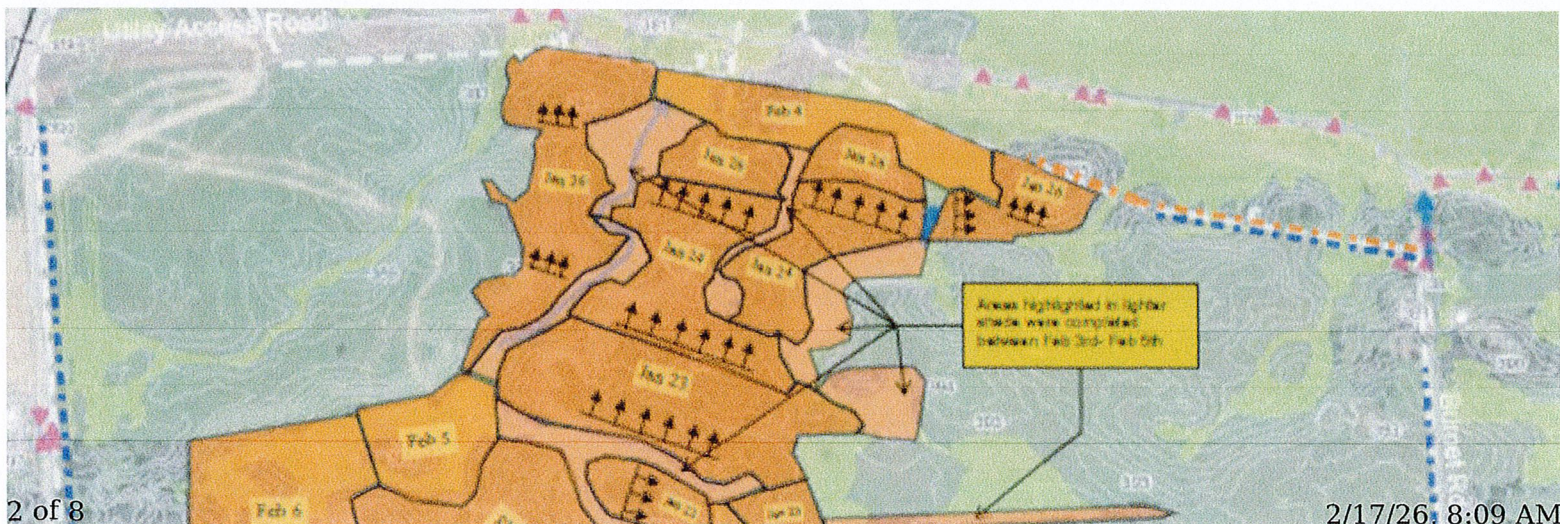


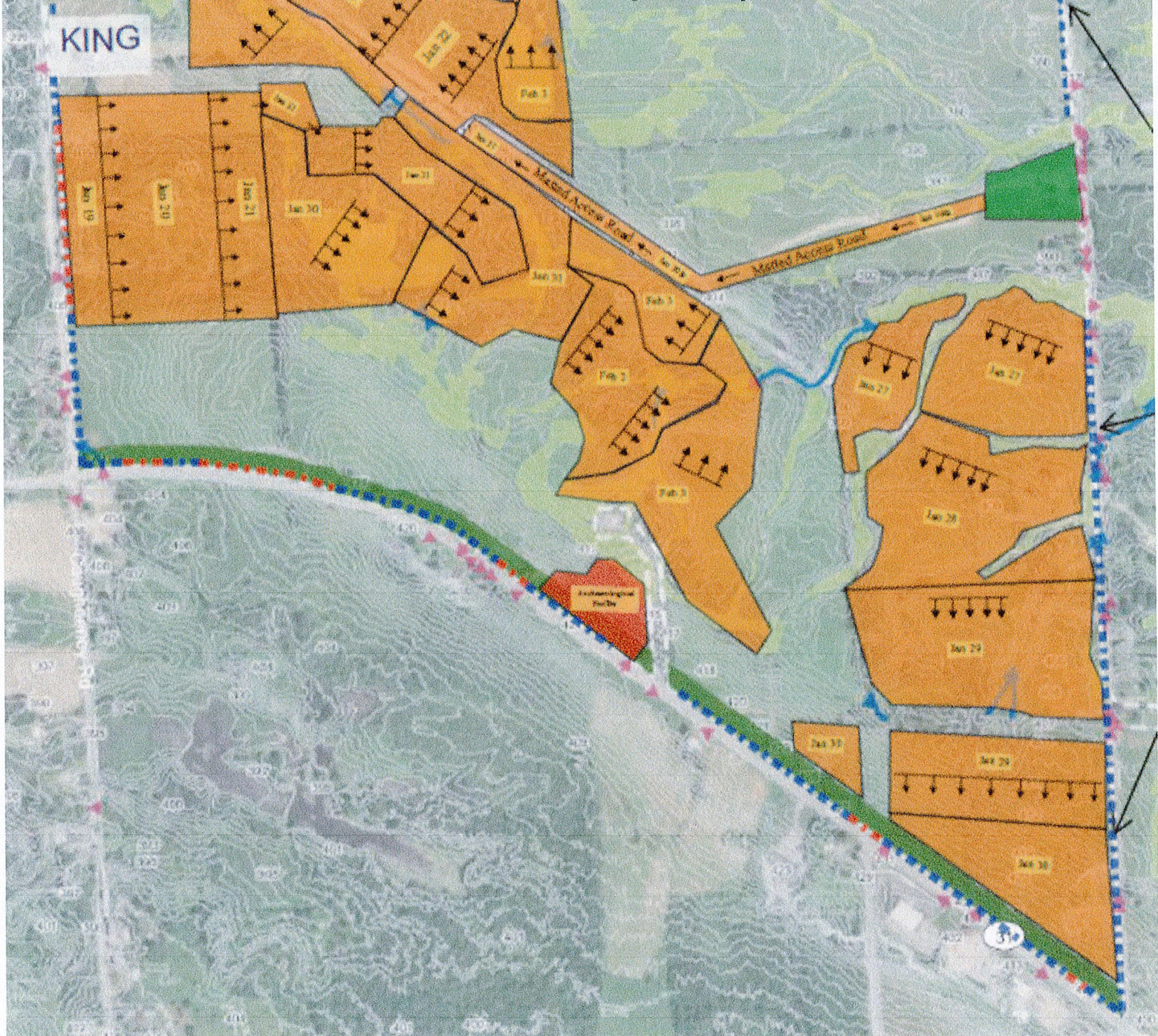
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The town does independent inspections of Micron's site, too, Bender said. One inspection has already been done, he said, and the next one is scheduled for later this week.





Contractors for Micron Technology had cut nearly 300 acres of forest in the first four weeks of site work. Brown shading indicates areas that were cleared through Feb. 12. The KING label on the left is the home where Azalia King, a 91-year-old widow, was forced to leave to make way for the project. Caughdenoy Road lies at the left of this map, Route 31 to the bottom and Burnet Road to the right. Special to Syracuse.com

Micron held its groundbreaking on Jan. 16. The company says it plans to build up to four massive semiconductor manufacturing plants on the 1,400-acre site.

The first phase of the project, to clear and level the site, will cost Micron an estimated \$1 billion.

Micron spokeswoman Anna Newby said the work is proceeding on schedule.

In less than a month, Micron has cut nearly 300 acres... grubbing, and preparation for excavation," Newby said in an email.

Grubbing is removing shrubs, brush and stumps. So far, just 10.5 acres of the Micron site has been grubbed, the latest report shows.

Contractors have also installed almost 2.5 miles of black plastic sheeting along the perimeter of the site at the corner of Route 31 and Caughdenoy Road.

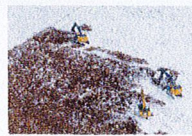
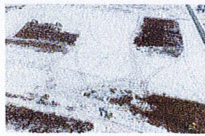
Supreme Industries, the Connecticut company clearing the trees, had 53 employees on site as of Thursday, according to the report. That's more than twice as many as on the first day.

After the trees are cleared, Micron plans to dig up and remove more than 1 million cubic yards of topsoil and then import 2 million cubic yards of stone to level out the site for the first factory.



1/9

9



Micron tree clearing work February 2026

READ MORE ABOUT MICRON TECHNOLOGY IN CLAY

NY's largest automotive group bets on Micron impact and buys Clay

2/17/26, 8:09 AM

https://www.thedailynewsonline.com/news/the-essential-guide-to-micron-s-chip-project-in-upstate-ny-timeline-hiring-construction-and/article_401e8a32-6c39-4d0d-bfca-258b00bda889.html

The essential guide to Micron's chip project in Upstate NY: Timeline, hiring, construction and costs

By Glenn Coin syracuse.com (TNS)

Jan 24, 2026

1 of 5



Micron Technology broke ground Jan. 16, 2026, on a \$100 billion computer chipmaking complex in Clay, New York, on Jan. 16, 2026. Pi from left are: Sen. Kirsten Gillibrand, Sen. Charles Schumer, Gov. Kathy Hochul, Micron CEO Sanjay Mehrotra and U.S. Commerce Sec Howard Lutnick.

Norman Trimble/syracuse.com

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SYRACUSE – Micron Technology broke ground today on a massive semiconductor factory

complex that could alter the economic landscape of Central New York.

If Micron does what it has promised, it will lead to 20 years of nearly continuous construction on what officials call the largest private development in New York state history.

Today's groundbreaking was attended by politicians from across the political spectrum, including President Trump's U.S. Department of Commerce secretary, Howard Lutnick; and U.S. Sen. Charles Schumer, who pushed through the 2022 CHIPS Act that could provide more than \$20 billion in taxpayer subsidies for the Micron project.

Micron says it could spend \$100 billion on up to four factories in the town of Clay. That could boost the local economy and bring unprecedented growth — and unprecedented traffic and noise — to Syracuse's northern suburbs.

The project has already seen several delays. The latest pushes back the opening of the first two factories by two to three years. The first is now projected to open in 2030.

The numbers remain staggering: When the complex is fully operational in 2045, Micron says, it would employ 9,000 people — nearly as many as Upstate Medical University, now the region's biggest employer.

Up to 40,000 spinoff jobs could be created, from semiconductor supply chains to hotels to schools. More than 4,000 construction workers would be on site at peak construction periods, so many that Micron plans to have them park at the airport and be shuttled to the work site.

That assumes Micron will build four fabrication plants, or fabs. The company now has government funding and approvals to build two of those plants.

The groundbreaking culminates a vision that began 30 years ago, when Onondaga County started buying land near Route 31 and Caughdenoy Road for a future business park. Three county executives continued to acquire land over the years, often through the threat of eminent domain. The pace accelerated in 2021 and 2022, when Micron became a reality.

⊗

Now begins a construction job that could take two decades to complete and sprawl across an area of former farms and swamps three times larger than the New York State Fairgrounds.

Micron says it will import nine million cubic yards of gravel and fill – enough to fill the JMA Wireless Dome to the roof four times – to level the low-lying site.

The complex at the corner of Route 31 and Caughdenoy Road would have as many parking spaces as Destiny USA.

For each of the four fabs, Micron would use more steel than the Golden Gate Bridge and more concrete than the Pentagon.

That's just the Micron campus. Onondaga County will spend \$1.4 billion or more on an industrial wastewater plant for Micron. It's the most expensive project the county has ever undertaken, and County Executive Ryan McMahon says Micron will pay for it all.

There's no guarantee Micron will build all four fabs. The company can tap into \$25 billion in taxpayer subsidies to build the first two fabs, but there's no public money yet for the other two.

Based on Micron's projections and the extensive environmental review, here's what we can expect in the coming years.

Construction

Site prep: Micron has hired Gilbane Co., one of the country's largest construction firms, to ready the site for construction at an estimated cost of \$1 billion.

The first job for Gilbane Co. and its subcontractors will be to start clearing 445 acres of forest. Micron's environmental report said that could take four months, but Gilbane will have to hurry. All tree-cutting must halt on March 31 and can't resume until Nov.1 because two species of endangered bats use the site to raise their young during the warmer months.

Once the trees are down, Micron will need to haul in about 2 million yards of gravel-like fill to level and stabilize the site, which contains about 200 acres of wetlands. That will be done mostly by truck, with more than 500 trucks going in and out of the site every day on two-lane roads.

Up to 4,000[ⓧ] construction workers could be on site at peak periods.

Factories

Work on the first fab, at the northwestern edge of the site, would begin late this year or early in 2027. Fabs would be built in succession; as each is done, it will be outfitted with equipment and start producing chips.

Here's the projected schedule for each complete fab:

- 2030 first fab
- 2033 second fab
- 2038 third fab
- 2041 fourth fab
- 2045 peak production

Rail spur

Construction also begins soon on a rail spur just across Caughdenoy Road from the main campus. When that's finished, which is projected to be in late summer, Micron will import the stone aggregate by rail to keep trucks off the road. The fill will be transported across Caughdenoy by a conveyor belt system 18 feet above the road.

→ Trains will come in and out of the rail spur from 6 a.m. to 10 p.m. seven days a week for 20 years, according to Micron's plans. }<

Traffic

New exits: The traffic from Micron and all the other newly created jobs would overwhelm current roads. That's why the state is planning to tackle three areas:

- Create a new exit on Interstate 81 in Cicero
- Redesign the already troublesome intersection of I-81 and Route 31
- Build a new exit on I-481, just east of the CSX rail line.

Widening: Routes 31 and 11 would be widened to four or six lanes.

Jobs

Construction: Between 2,000 and 4,000 construction workers are expected to be on the site through 2030, according to the final environmental report on the project released in November. The numbers will fluctuate after that, with just a handful of workers at periods between construction of fabs and up to 4,000 during a few peak years in the 2030s.

Operations: A year ago, Micron said it had hired about two dozen people for the Clay project and would ramp up hiring in 2025. That hasn't happened yet, given that the opening of the first two fabs have been delayed by two to three years. Just one job is listed on Micron's careers website for Clay, and that's a remote position.

Before the delays were announced, Micron said it would hire 36 people for the Clay project this year, nearly all of them engineers earning \$100,000. Hiring for fab operations begins in earnest in 2028 and 2029, when more than 500 engineers and 200 technicians and support staff would be hired.

Within a decade, Micron says it will have 4,500 employees in Clay.

Utilities

Electricity: Micron will use more electricity than the states of New Hampshire and Vermont combined, and it needs that power 24/7. That's why National Grid plans to expand the substation across Caughdenoy Road and lay eight underground ultra-high-voltage lines – two per fab, for redundancy – under the road.

That work is expected to start in late 2027 and be done in 2033. National Grid says Micron will pay “the substantial majority” of the cost.

Water: Micron projects it would use up to 48 million gallons a day of fresh water if all four fabs are built. That's more than the entire Onondaga County Water Authority system uses today to serve its 350,000 customers.

OCWA would spend an estimated \$550 million to meet Micron's needs. The agency plans to upgrade local water lines in Clay starting this year and eventually lay a 26-mile-long water line from Lake Ontario.

Industrial wastewater: Micron would discharge 40 million gallons a day of industrial wastewater into a wastewater plant to be built by the county.

The county would spend \$1.4 billion to \$2.6 billion on the plant, according to recent estimates from engineering consultants. It would be the largest single project the county has ever undertaken. County officials say Micron will pay for the plant through user fees.

Construction of the plant would start late this year and be completed in late 2032.

Sewage: The Oak Orchard plant is undergoing a \$549 million upgrade, mostly to serve the potential growth of homes and businesses in the Clay area but also to handle Micron's wastewater.

Timeline

Here's a brief recap of the major milestones ahead. All of these are subject to change.

- **January 2026:** Tree-clearing and site preparation begins on the main campus and rail spur.
- **Summer 2026:** Rail spur opens and work crews start pouring concrete for fab 1 foundation.
- **2027:** The county starts work on the industrial wastewater plant that will be designed to remove the toxic chemicals widely used in chipmaking.
- **2028:** Construction work starts on fab 2 and on an employees' child care center just up Caughdenoy Road. Hiring ramps up. OCWA starts work on the second line from Lake Ontario.
- **2029:** County completes work on the first phase of the industrial wastewater plant.
- **2030:** Fab 1 begins operations and construction begins on fab 2, both late in the year.
- **2033:** Fab 2 begins operations.
- **2035:** Construction begins on Fab 3. Micron reaches the 4,500-employee threshold, half of what the company says it will ultimately employ.
- **2037:** Third fab opens.
- **2039:** Construction begins on the fourth and final fab.
- **2041:** Final fab is completed.
- **2045:** The complex reaches full production.

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CENTRAL NY NEWS

Prominent Syracuse developer plans an electricity-gulping data center in suburbs

Updated: Nov. 26, 2025, 3:31 p.m. | Published: Nov. 26, 2025, 6:00 a.m.



This site at the corner of Hencle Boulevard and Oswego Road in Lysander could be home to a data center in the coming years. Syracuse.com



By Tim Knauss | tknauss@syracuse.com

Lysander, N.Y. – On 120 acres of vacant land in suburban Lysander, a well-known Onondaga County developer plans to build a data center that could consume as much electricity as roughly 200,000 average households.

Ranalli Super DC, LLC, a company controlled by James Ranalli of United Auto Supply, has requested a connection to the electric transmission network that would allow it to draw up to 300 megawatts for a data center, according to the New York Independent System Operator, which runs the electric grid.

That's nearly two-thirds as much power as would be used by the first chip fab planned by Micron Technology 12 miles down the road in Clay. The initial Micron fab, an energy-intensive factory the size of 10 football fields, plans to draw 480 megawatts.

Ranalli declined to talk about his project. Onondaga County Executive Ryan McMahon said the plan for a data center is at a very early stage.

"I don't know exactly where the project stands," McMahon said. "I do know this site is in the process of being permitted for a high-tech use like that related to the energy. I think it's a strong candidate to get the necessary energy upgrades, where you could do that type of project there."

So far, the only sign of Ranalli's plan appears to be its application to the NYISO to connect to the grid. Lysander Supervisor Kevin Rode said he was not aware of any recent permit application filed with the town by Ranalli Super DC.

The developer's request to tie into the electric grid could take a long time to process, in part because the New York Independent System Operator has been inundated with requests from data centers. Ranalli Super DC is projected to connect to the grid in 2028.

The Lysander site, near the intersection of Route 48 and Hencle Boulevard, has the advantage of being near a 345-KV, high-voltage transmission line that runs from Fairport, in Monroe County, to the Clay substation across the street from Micron. ←

Four years ago, Ranalli Super DC proposed a different project at the site. Ranalli sought to build a 350,000-square-foot auto parts warehouse at the property, which is zoned industrial. After facing opposition from neighbors, the company withdrew its plan in 2023.

Ranalli is one of Syracuse's biggest real estate developers. He's also the CEO of United Auto Supply, a family-owned Syracuse company that employs 1,200 people in 34 locations in New York, Pennsylvania and Ohio.

Although NYISO officials classify the Ranalli project as a data center, McMahon said the site has potential to be used for a variety of high-tech functions if it gets approval for 300 megawatts of electric service.

"I think if you can get the energy, it opens it up to more than just a data center," McMahon said.

Officials at the NYISO said they could not provide details about the proposed data center. Before approving the project's connection to the system, the NYISO will gather information from the developer on how the facility would operate and will evaluate the impact that could have on the grid.

Those calculations are becoming increasingly difficult.

'Profound reliability challenges'

NYISO has been hit this year with a tidal wave of requests from data centers like the one proposed by Ranalli, officials said. The surge of proposed projects – some of which will be built, others of which may not be – is raising concerns at the NYISO about the potential for future blackouts if the state doesn't add generating facilities at a far faster pace than at present.

In its latest Comprehensive Reliability Plan issued Friday, the NYISO said the combination of surging demand and lagging power plant capacity could lead to shortfalls in as little as three to five years.

"New York's electric system faces an era of profound reliability challenges," the plan stated.

Ranalli's project is one of more than two dozen energy-intensive facilities that have asked to connect to the grid in just the past year. Nearly all of them are data centers. They are seeking a combined 10,000 megawatts of power. That's roughly one-quarter of the state's total capacity and more than three times the combined output of New York's four nuclear reactors.

"The number of large loads, and specifically data centers, is growing exponentially," said Kevin Lanahan, a vice president at the NYISO.

The surge of data center requests comes on the heels of several big manufacturing projects, including Micron, that will also strain the grid. Micron, whose interconnection request dates back two years, is requesting 1,056 megawatts for the first two of four chip fabs planned in Clay.

The proposed Lysander data center likely would not be the last to come to Onondaga County.

Data centers, which fuel artificial intelligence and provide the backbone for much of the modern

economy, are popping up across the nation. In general, they are buildings packed with computer equipment such as servers, storage devices, routers and switches. They require lots of electricity, both to run the equipment and to keep it cool.

U.S. data centers used 176 terawatt-hours of electricity in 2023 – 4.4% of the nation’s total – according to a report by Lawrence Berkeley National Laboratory. By 2028, they are expected to account for up to 12% of total electricity usage.

Estimates vary on how close data centers usually come to using their full power allocation. Several reports suggest the range is somewhere between 50% and 80%. At those rates of usage, the Lysander facility would use as much electricity as 175,000 to 280,000 average households in National Grid’s Upstate service territory.

Developers often face local opposition when they seek to build data centers.

In the Tompkins County town of Lansing, for example, the Sierra Club and others oppose a pending application for a data campus on the site of a shuttered coal-fired power plant on Cayuga Lake. Among other things, opponents argue that the project’s heavy energy use could drive up electric rates and increase greenhouse gas emissions. The developer, TeraWulf, has said it would invest \$15 million in electric system upgrades and would curtail usage during periods of peak demand.

Similar opposition has greeted proposed data centers in Genesee County, Otsego County, and other locations around the state.

A less predictable grid

Data centers are not the only reason the New York electric grid faces potential shortfalls. Increasing adoption of electric vehicles and electric heating systems also pose a challenge.

The likelihood of skyrocketing demand for electricity comes at a critical time as New York energy officials struggle to shore up one of the nation’s oldest electric systems.

As grid operators try to anticipate which data centers will actually get built, they also have to plan for the likely retirement – or catastrophic failure – of aging power plants that are increasingly unreliable.

The NYISO has been sounding steadily louder alarms about the state of the electric system. In the Comprehensive Reliability Plan, it points to several concerns:

- The state’s fleet of power plants is among the oldest in the nation. Natural gas-fired generators

provide nearly half the state's power, but a quarter of them are more than 50 years old, making them susceptible to retirement or unplanned shutdowns. New York also relies on three of the nation's oldest nuclear reactors.

- New York has not built new generating capacity fast enough to keep up with power plant retirements, let alone to accommodate growth. Since 2019, the state has added 2,274 megawatts while 4,315 megawatts have been retired.
- New York state typically imports more than 10% of its power from neighboring electric systems in New England, Pennsylvania and Canada. But those systems face similar struggles to supply growing demand, which could put imports at risk.
- Demand for electricity is poised to skyrocket. Data centers and large industrial customers, led by Micron, are lining up to connect to the grid at an alarming rate. The size and number of proposed new data centers and other large customers far outpaces the projected growth of generating plants and transmission lines.

"The recent increase of interconnection requests for large load projects poses a risk to reliability as the magnitude and speed of these requests are far exceeding that of additional resources that would be needed to serve them," the report stated.

Uncertainty over the future growth of data centers has forced the ISO to forecast a range of scenarios for future planning.

If all of the proposed large loads come online as scheduled, the electric grid could run out of spare capacity and become prone to blackouts as early as 2027 or 2028, the Comprehensive Reliability Plan says. If none of the projects gets built, that timeline gets extended until 2034, the agency predicts.

Either way, given the length of time it takes to plan and build new power plants and transmission lines, the situation is urgent, the NYISO said.

"Most plausible futures point to significant reliability shortfalls within the next 10 years," the organization said.

NY ENERGY TRANSITION

NY's nuclear plants want billions more in subsidies. Are state officials in a position to say no?

Hochul ratchets up NY's nuclear plans, aims to lead U.S. in building

new reactors

Fire chief raises concerns about yard-sized battery storage system proposed in Syracuse

Army selects Fort Drum as possible site for new nuclear plant

NY puts off implementing law that would ban natural gas in new homes and buildings

Staff writer Tim Knauss can be reached at: [email](#) | [Twitter](#) | 315-470-3023.



Tim Knauss

Tim Knauss is a watchdog reporter on the public affairs team at Syracuse.com, with four decades of experience covering Central New York. Knauss has written about a variety of subjects recently including unfair...more

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Contact the Onondaga County Legislature

From Leslie Lawrence <onondagacountylegislature@ongov.net>

Date Mon 2/16/2026 9:16 PM

To Office of the Onondaga County Legislature <onondagacountylegislature@ongov.net>

NOTICE: This email originated from outside of Onondaga County's email system. Use caution with links and attachments.

Name: Leslie Lawrence

Your Email Address: [REDACTED]

Question or Comment: :

It feels way to early to create a new industrial sewer district for Micron. There are big questions about the environmental impact of this facility. Environmental experts need to study it with honest information about the chemicals and the waste that will put in the area.

Micron site comments

From tom ballog [REDACTED]

Date Tue 2/17/2026 8:08 AM

To Office of the Onondaga County Legislature <legislature@ongov.net>

NOTICE: This email originated from outside of Onondaga County's email system. Use caution with links and attachments.

Hello,

I have no real questions about the micron project but mostly statements.

I think that this project is not worth the damage that will be done to a critical ecosystem in Onondaga county. These wetlands capture huge amounts of carbon, retain and control huge amounts of water, and support massive diverse ecosystems. The amount of run off from destroying this wetland will wreak havoc on local waterways like creeks, rivers, and retention ponds. Flooding will be horrible and lake levels will be less stable than we've already seen. Have we not learned our lesson with Onondaga lake? How long can we abuse our environment before it gives out?

Aside from these issues, I also believe that the local communities cannot handle the Increase in traffic and construction, despite recent changes to roadways in the area. The infrastructure just isn't there and I don't know if the community wants it to be there.

The fact that we are considering this level of destruction and pollution for something as short sighted as "jobs" is sad. I am all for creating jobs in the county but we need to be smarter about it and utilize land better.

Please reconsider this project, if not for us, for future generations.

-Tom Ballog

Comments for Public Hearing on Industrial WW District formation

From John Przepiora [REDACTED]

Date Tue 2/17/2026 10:26 AM

To Office of the Onondaga County Legislature <legislature@ongov.net>

NOTICE: This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

1. Will existing residents be held harmless in the face of growth and infrastructure Micron's project will induce?

The increase in wastewater treatment cost is a case in point which Onondaga County directly controls. The proposed expansion and upgrade of the Oak Orchard WWTP reportedly may increase the unit charge by upwards of 50%. At the same time the OOWWTP phase 1 project appears to include improvements and costs which solely benefit the Micron factory, such as the improvements needed to create a reuse and recycled water process, and reconfiguration of the existing OOWWTP to make room for the industrial WWTP. **It is incumbent on the County officials to disclose and explain whether there are processes and expenses planned to be part of the phase 1 OOWWTP upgrade that solely benefit Micron and/or other industrial users and that are over and above the needed wastewater treatment needs of residential and commercial properties. We should not be attracting Micron to Onondaga County on the backs of existing residents.**

2. While it is laudable that Onondaga County is proposing a dedicated industrial WW District to pay for construction, operation and maintenance of facilities to handle and treat the industrial wastewater from the White Pine Development, approval of such a financing mechanism should be held until much more information is known about what facilities and related capital, operating and maintenance costs are estimated and fully disclosed. **The public deserves to know whether proposed treatment will protect the environment from the various hazardous chemicals which are inherent in semi-conductor manufacturing. The public also deserves to know what debt and operating costs the county will be assuming; and what costs will be assessed to the industrial users of the systems.** There are serious risks of IWWTP undertaking which has been estimated to have a construction cost of between \$2 billion and \$3 billion. **What if industrial rate payers fail to pay expected fees and revenue doesn't offset costs? And, what about environmental risk that Onondaga County is shouldering? What protections are in place, or proposed, to hold harmless the county and its residents from a potential environmental and financial disaster?**

John

John Przepiora, PE, retired/unregistered
President & Director

GreeningUSA, Inc.

GreeningUSA.org




*...Advocating for sustainable communities
to the benefit of local economies and environments.*




SustainCNY. . .Working together for a sustainable CNY!

Public Hearing Notice - OAK ORCHARD INDUSTRIAL SEWER DISTRICT

From Shannon Pagano 

Date Tue 2/17/2026 11:06 AM

To Office of the Onondaga County Legislature <legislature@ongov.net>; Gregory Eriksen <GregoryEriksen@ongov.net>; Nodesia Hernandez <nodesiahernandez@ongov.net>

 1 attachment (60 KB)

February 17 Public Commentw.pdf;

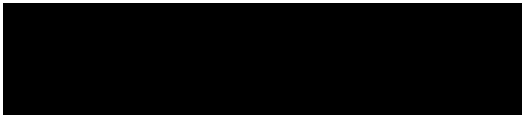
NOTICE: This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

Good morning -

Attached please find written comments for today's Public Hearing.

Thank you,

Shannon L. Pagano, P.E.



February 17, 2026 – Public Hearing Comments – Oak Orchard Industrial Sewer District

Written Comments from Shannon L. Pagano, P.E.

The following comments and questions are being submitted to be part of the record. These questions were also asked during the January 8, 2026 Commissioner’s Hearing.

1. County-Paid Engineering Report (“Engineering Report”)

The Department of Water Environment Protection has commissioned and paid for an engineering report for the Industrial Wastewater Treatment Plant that was submitted within the Joint Application Permit submitted to NYSDEC; however, this County-funded report is not referenced or incorporated into the MP&R authored for this District.

2. “No Monetary Component” Statement

The MP&R prepared states that the District “does not have a monetary component” and that the net impact to sewer users is “\$0.00 per unit per year.” This statement appears to conflict with a County-commissioned Engineering Report that identifies defined infrastructure and capital costs for facilities located within this District.

3. Cost Identification and Allocation

The specific capital and operational costs associated with the industrial treatment facility—such as conveyance, pumping, power supply, site infrastructure, or controls—were identified by the Department during preparation of the Engineering report – however, these costs are not documented in the MPR.

4. Shared or Enabling Infrastructure

The MPR does not describe any infrastructure described in the County-paid Engineering Report that relies on or enables use of existing Consolidated Sanitary District assets. Nor does the MPR detail and ensure that no portion of those costs would be borne by existing ratepayers.

Micron Sustainability Challenges and Concerns

By John Przepiora, PE, President, GreeningUSA

February 16, 2026

What follows is an overview of some of the most serious sustainability concerns and questions relating to the Micron development.

1. Inherent in semi-conductor manufacturing development are serious health, safety and economic and environmental justice concerns. These concerns range for the use and disposal of hazardous materials to the inequitable distribution of employment benefits and the widening of the income inequality gap in a community that now will have many high paying jobs and only little trickle down effect to those ill equipped to be employed in a field that values high technology skills and competencies. **And while much effort seems to be paid to creating the school to jobs pipeline, much more needs to be done to guarantee good jobs in an equitable manner.** The web site [CNY United for Community Benefits](#) summarizes these overarching concerns and catorgizes them into three broad areas:
 - a. Job Access, Workforce Development, and an Equitable & Safe Workplace.
 - b. Housing and Transportation Justice and Equity.
 - c. Public Health and Safety, Environmental Health, and Resource Justice.

Rather than restate the views included in this Community Benefits Platform please visit: [CNY United for Community Benefits](#) or use the following QR code.



2. The environmental and health impacts posed by Micron's production process, which relies on highly toxic chemicals including the per- and polyfluorinated compounds, the so called forever chemicals, is perhaps the biggest public and environmental health concern posed by the project. The main question is: **What are Onondaga county and Micron doing to keep PFAS out of our air, water and landscape?**

3. The population growth which is estimated to increase by 60,000 people and nearly 30,000 new households will increase the cost of living and exacerbate income inequality commonly associated with technology based economic development. The energy chip fabs require will increase electric utility costs for all and water usage by Micron will likely will cause an increase in water rates as well, and require very costly wastewater treatment which will burden Onondaga County residents to Micron's benefit. **The cost of living will increase dramatically for central New York residents. What is being done to keep household costs affordable and prevent the rise of homelessness?**
4. Why is Micron being allowed to come to NY and dramatically create a tremendous amount of greenhouse gas emissions which are detrimental to NYS's climate mitigation plans as well as the health of residents? **Also, what construction practices, such as low carbon concrete and steel, will be used to reduce imbedded GHG? Why are 12,000 parking spaces being built in lieu of creating a public transportation system that is more energy efficient and reduces traffic congestion?**
5. The local impacts of transforming Clay, NY will be dramatic for Clay residents. Not only will the effects of increased traffic and noise be dramatic, there is likely to be a significant heat island effect that will raise the local area temperatures and cause additional need for higher energy use for summer cooling. **What is being done to minimize the local area temperature rise and other nuisance impacts local residents will likely experience?**
6. Related to the household growth is the need for growth in municipal services. It is unclear whether municipalities will generate enough tax revenue needed to fund the increase in service demand for regular services such as police, fire, sanitation and highway and street maintenance, without raising taxes on existing residents. **What is being done to smartly manage the household growth and the cost of municipal services? Will existing residents be held harmless in the face of growth Micron's project will induce?**
7. The increase in wastewater treatment cost is a case in point which Onondaga County directly controls. The proposed expansion and upgrade of the Oak Orchard WWTP reportedly may increase the unit charge by upwards of 50%. At the same time the OOWWTP phase 1 project appears to include improvements and costs which solely benefit the Micron factory, such as the improvements needed to create

a reuse and recycled water process, and reconfiguration of the existing OOWWTP to make room for the industrial WWTP. **It is incumbent on the County officials to disclose and explain whether there are processes and expenses planned to be part of the phase 1 OOWWTP upgrade that solely benefit Micron and/or other industrial users and that are over and above the needed wastewater treatment needs of residential and commercial properties. We should not be attracting Micron to Onondaga County on the backs of existing residents.**

8. While it is laudable that Onondaga County is proposing a dedicated industrial WW District to pay for construction, operation and maintenance of facilities to handle and treat the industrial wastewater from the White Pine Development, approval of such a financing mechanism should be held until much more information is known about what facilities and related capital, operating and maintenance costs are estimated and fully disclosed. **The public deserves to know whether proposed treatment will protect the environment from the various hazardous chemicals which are inherent in semi-conductor manufacturing. The public also deserves to know what debt and operating costs the county will be assuming; and what costs will be assessed to the industrial users of the systems.** There are serious risks of IWWTP undertaking which has been estimated to have a construction cost of between \$2 billion and \$3 billion. **What if industrial rate payers fail to pay expected fees and revenue doesn't offset costs? And, what about environmental risk that Onondaga County is shouldering? What protections are in place, or proposed, to hold harmless the county and its residents from a potential environmental and financial disaster?**
9. Routine monitoring of our air and water is necessary due to discharges which the Micron development and the connected actions (e.g., wastewater treatment) will release to the water and the air. **Will the protections and monitoring being required by the NYSDEC be sufficient to protect the people and environment from hazardous wastes?** It is presently unclear how the proposed wastewater projects will prevent PFAS and other highly hazardous chemicals from harming our water and the health of the community. **WEP and Micron need to be clearer about what their plans are before agreeing to spend billions to upgrade treatment facilities.** The same must be said about air emissions. Micron and NYSDEC should be asked to explain in plain language exactly what will be coming from the fabs. **The advice of third party, independent experts should be sought to assess what is being said. The public must know what monitoring will regularly be done under the existing permit requirements and what more is needed beyond permit**

requirements. All routine monitoring results must be publically available and a comprehensive environmental oversight program that includes independent experts and other stakeholders should be created.

10. To a significant degree the recommended due diligence with respect to hazardous pollutants must also be applied to the financial resources which are being spent to serve Micron's needs and the community's needs in the face of this transformational industrialization of the northern suburbs. Not only must care be taken to openly examine the costs and fiscal implications of the proposed Oak Orchard projects, but a thorough understanding of the fiscal implication of all impacted community services must be achieved. **What will it mean for police and fire services when 4,000 construction workers arrive? Will the Sherrif's department and other police agencies be able to handle the potential increase in criminal activity as well as the traffic related impacts?** It may be prudent to engage the services of an independent fiscal watchdog to avoid unintended adverse financial impacts.

11. OCIDA has proposed (approved?) granting Micron significant property tax exemptions for 49 years though it never was made clear whether the net increase in municipal property taxes will cover the service needs and prevent a rising property tax burden on County residents and businesses. **It is necessary for OCIDA and Micron to explain why the proposed project approval and OCIDA resolution agreeing to the PILOT agreement requires just 4,500 fab jobs when it has been widely publicized Micron's fabs, when completed, will result in 9,000 factory jobs** in Onondaga County.

12. Finally, solving these sustainability problems cannot be done in a vacuum of back room politics and deal making. To date this development has been devoid of a robust public engagement over the environmental and equity challenges posed. While OCIDA and NYS have utilized existing regulatory requirements to obtain citizen input, the effort has been marginal at best. The public deserves more involvement and interaction with our governmental leaders and even with Micron's executives to truly partner with the residents of Onondaga County and to work toward developing the objectives of Onondaga County in a sustainable manner in order to avoid chaos, calamity, environmental harm to our land, water and air, and unsustainable use of our fiscal and human capacity.

OPPOSE proposed Micron wastewater/sewer plant proposal in Clay

From [REDACTED]

Date Tue 2/17/2026 8:05 PM

To Office of the Onondaga County Legislature <ONONDAGACOUNTYLEGISLATURE@ONGOV.NET>

NOTICE: This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

How dare you even consider charging the Onondaga County taxpayers to fund your astronomical Sewer and Wastewater plant to clean toxic PFA's from Microns sludge and wastewater.

If Micron needs a highly specialized, high volume plant then they should fund it themselves...AND guarantee that ANY and ALL PFA's are eliminated in the process. Where is the solid toxic waste being disposed of and who will dispose of it?? Who would want it or even take it??

Not only is the financial cost exorbitant, the toll on Public Health from the unknown exposure to PFA's is a risk too high to take. Who would want to live in a community with exposure to these toxins in their groundwater and air??

I firmly oppose the proposed Clay Wastewater/ Sewer project..

Judy Fero
Syracuse, NY

Waste water treatment plant

From cathy colelli [REDACTED]

Date Tue 2/17/2026 8:12 PM

To Office of the Onondaga County Legislature <onondagacountylegislature@ongov.net>

NOTICE: This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

In regard to the Micron Waste Water Treatment plant construction costs and responsibility of operation; I am submitting my comments prior to the meeting on March 3rd.

- 1 - There should be no cost to the taxpayer for the construction or operational costs of this plant which essentially has a single user
- 2 - The county should not be responsible for the operation of the plant nor held liable for any problems which may arise
- 3 - Should the county decide to obtain financing to pay for the construction of the plant, Ryan McMahon stated that the loan and operating costs would be paid back by user fees. If this is to be, the county should publish a comprehensive loan repayment schedule. The same should be published for reimbursement of operational costs.

Cathy Colelli
[REDACTED]
[REDACTED]

[Sent from Yahoo Mail for iPad](#)

Questions about Micron and Onondaga County's New Water Treatment Plan

From Chris Herrmann [REDACTED]

Date Sat 2/21/2026 1:13 PM

To Office of the Onondaga County Legislature <onondagacountylegislature@ongov.net>

NOTICE: This email originated from outside of Onondaga County's email system. Use caution with links and attachments.

Upon reviewing the latest legislature meeting, I noted that the County failed to plan for an increase in utility costs, resulting in a deficit in funds. It reminded me of only one of my concerns regarding the Micron project: supply and demand regarding electricity and water, and how it will impact a community *already* seeing rising costs for utilities. I know state senators are currently being tasked to address these concerns, but I'm interested to know whether or not the County has some sort of plan to address the rising utility costs resulting from the construction of a fabrication plant that will demand thousands of kilowatt hours a day.

But I am *most* worried about the potential chemical contamination of our groundwater. Chip fabrication plants have been historically linked to health concerns, their effluent traditionally containing toxic chemicals. The precise nature of the chemicals who use is proposed by Micron is apparently still under seal for proprietary reasons. But I want to know WHAT chemicals - including PFAS - will be in a plant generating wastewater less than a mile from my home. Why are we being relegated to the mercy of the county's plan to dispose of these chemicals without absolute guarantees for our safety? And who is paying for the construction of this new water treatment plant?

Is there a plan in place to do baseline groundwater testing in the area around the proposed plant construction? As someone who has lived in this area off and on for fifty years, who possesses a large garden that feeds both myself and my community, I intend to do groundwater testing on my property, which is located within a mile of the proposed construction. I want to know what the county plans to do to remediate, if the area becomes contaminated by the toxic chemicals in use at this proposed fabrication plant.

Does Micron, OCWA, or some other "authority" intend to monitor the health of the Oswego River and downstream? Have the residents who live along the river been notified of what the release of the plant's effluent might do to their enjoyment of their homes, especially given their generally higher tax burden for waterfront property in NYS? Do Oswego residents understand how they could be impacted by decisions made by our adjoining county?

What will be done about any potential flooding issues caused in *our* county by the filling of wetlands, since creating new wetlands in *Oswego* is not going to address groundwater level issues on the *south* side of the Oswego River?

I have also recently learned that the wastewater disposal apparatus might be proposed to be routed through a Native historical site, and next to a natural spring. This suggested path would not only increase

the chances of contaminating groundwater if infrastructure fails, but if it indeed impacts traditionally tribal lands, that too is extraordinarily problematic.

In that vein, there seems to have been a rush to the *taking* of land, residential property adjacent to the site specifically. I'm interested in the county's outlook on the further taking of land, should improvements deemed "necessary" to Micron's success - such as mineral deposits, or the easement of electrical or water infrastructure - be identified. Do residents who have paid taxes here for dozens of years have any assurances that they will be able to remain on their property once Micron is established?

And lastly, given that the tree clearing currently taking place has been done by a company headquartered in *Connecticut*, what happened to the promise of more LOCAL jobs?

Thank you for your attention to my concerns,

Christine Herrmann

Industrial Waste Water plan

From WENDY YOST [REDACTED] >

Date Sun 2/22/2026 6:45 PM

To Office of the Onondaga County Legislature <onondagacountylegislature@ongov.net>

NOTICE: This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

Dear County Legislature:

I am opposed to creating the industrial waste water district. It would be safer and more clear if the both phases of the wastewater treatment take place at the Micron site. We won't be transporting untreated water through long pipelines and then assuming responsibility for a complicated, technical procedure that his extremely important to the safe use of the chemicals used at the site. If the county owns the treatment plant, it seems that the county is responsible for potential contamination of the water supply.

Wendy Yost
[REDACTED]

Wastewater treatment plant

From Leslie Lawrence [REDACTED]

Date Mon 2/23/2026 6:19 PM

To Office of the Onondaga County Legislature <Onondagacountylegislature@ongov.net>

NOTICE: This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

Dear County Legislators,

I have concerns about the proposed industrial wastewater treatment plant.

If Micron is responsible for cleaning the wastewater why don't they build the plant and do all treatment on their campus. Micron will know the forever chemicals/PFAS they're using (the county will not) and can best ensure water is clean and safe. There would be no need to disturb land, lay pipes or worry about leaks in the future.


If the treatment plant is built as presently proposed I'd think that in regards to financing the county and Micron would have more than a verbal understanding or an agreement still being negotiated. I'd expect something written and signed for how payment will be made before Legislators would give a go ahead. In addition, since this part of the plan was not included in the EPA Environmental Impact Study, it warrants a complete environmental review before it goes forward.

Sincerely,
Leslie Lawrence

[REDACTED]

Comments on Industrial Wastewater District in T. of Clay

From Don Hughes <[REDACTED]>
Date Tue 2/24/2026 12:00 AM
To Office of the Onondaga County Legislature <onondagacountylegislature@ongov.net>; Gregory Eriksen <gregoryeriksen@ongov.net>; Elaine Denton <ElaineDenton@ongov.net>

 1 attachment (155 KB)
Cmts of DJHughes on Industrial WW District-23Feb2026.pdf;

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Please see attached comments.

Donald J. Hughes, Ph.D.

[REDACTED]

=====

[REDACTED]

=====

"dans les champs de l'observation, le hasard ne favorise que les esprits préparés" ("In the field of observation, chance favors only the prepared mind") **Louis Pasteur**, French chemist and microbiologist (1822 -1895)

MEMORANDUM

TO: Onondaga County Chair Nicole Watts; Environmental Committee Chair Gregg Eriksen; Planning & Economic Development Committee Chair Elaine Denton, and all county legislators

FROM: Donald J. Hughes

DATE: February 23, 2026

Re: Resolution for the creation of an Oak Orchard Industrial Sewer District

I am writing to express my opposition to the proposed creation of an Oak Orchard Industrial Sewer District. I attended the joint meeting of your respective committees on February 16th. Cydney Johnson, Deputy County Executive for Physical Services emphasized that the creation of this district was primarily for servicing the wastewater needs of one user: Micron Technologies, Inc. She was asked, but was unable or unwilling, to provide answers to basic questions such as:

- How much will the proposed Industrial Wastewater Treatment Plant (IWWTP) cost?
- How will Micron repay the county for building and operating the IWWTP?
- Who will be responsible for meeting discharge limits?

I am not proposing that the Micron project be halted. Rather, I am calling on the Onondaga County Legislature to do its due diligence as an advocate for the health and financial wellbeing of the residents of the county. Creating this industrial sewage district is an essential first step towards having **the county**—not Micron—build a treatment facility specifically to treat Micron’s wastewater. My advice to you: Micron, not the county, should be solely responsible for treating its wastewater. Do not create an Industrial Sewer District.

Here are major concerns that I have:

1) Extremely high costs

The County Executive has consistently lowballed estimated cost of constructing the IWWTP, saying most recently that it would cost about \$1 billion. However, as reported on Syracuse.com, the county’s own consultants have estimated much higher costs. “ the county’s own consultants calculate the price tag between \$1.4 billion and \$2.6 billion.” (G. Coin article published Jan. 07, 2026)¹

Regardless of whether the final cost is \$1 billion or over \$2 billion, the fact stands that this wastewater plant is enormously expensive—far more than the county has spent on any

¹ <https://www.syracuse.com/micron/2026/01/microns-industrial-waste-costs-soar-for-treatment-plant-as-critics-point-to-little-environmental-review.html>

single project, including the upgrade of the Metro sewage treatment plant 20+ years ago. How would the county raise these funds?

Once built, the treatment plant will be very costly to operate because it uses advanced treatment processes like ultrafiltration and reverse osmosis.

These costs should be directly borne by Micron, not the county ratepayers! I call your attention to the fact that Micron is set to receive approximately \$25 billion in grants and tax credits from the Federal and New York state governments. In addition, Micron is making record profits. As reported in December 17, 2025 in Syracuse.com: "Micron's sales for the quarter that ends this month were \$13.6 billion, a record, the company said today. The previous record was set last quarter, with sales of \$11.3 billion. Micron made a \$5.2 billion profit this quarter."²

2) Who is responsible for environmental compliance?

With the creation of an industrial wastewater district, the county will be operating the IWWTP. Complying with the SPDES discharge permit will be completely the responsibility of Onondaga County's Department of Water Environment Protection. I am not confident in the Department's abilities to build and operate new facilities after the recent debacle with the sewage sludge drying facility at the Metro treatment plant.

In any case, why should the County be held responsible for fully treating Micron's wastewater? The company has acknowledged its wastewater will contain PFAS—so-called "forever chemicals"—which are highly toxic, very difficult to filter out, and almost impossible to break down. Micron's Final Environmental Impact Statement, Appendix L-1³ notes that

Wastewater at the Micron Campus may include a mix of the following types of PFAS in ppt-level concentrations: perfluoroalkyl carboxylic acids, perfluorosulfonic acids, fluorotelomer sulfonic acids, perfluoroalkane sulfonamides, perfluoroalkane sulfonamidoacetic acids, perfluoroalkane sulfonamide ethanols, per- and polyfluoroether carboxylic acids, ether sulfonic acids, and fluorotelomer carboxylic acid (SIA 2025).

In addition to PFAS, there are other industrial compounds identified in Micron's wastewater which must be treated. This includes mercury and tetramethyl ammonium hydroxide (TMAH) which are also resistant to treatment and are toxic. Under the proposed

² <https://www.syracuse.com/micron/2025/12/micron-again-reports-record-sales-as-ai-market-continues-to-boom.html>

³ FEIS, dated Nov. 7, 2025. Appendix L-1 Use, Management, and Disposal of Per- and Polyfluoroalkyl Substances at the Micron New York Semiconductor Fabrication Facilities

plan, the county will assume all responsibility for making sure the water discharged to the Oneida River from the IWWTP meets all limits set by the state DEC.

Furthermore, it will be the responsibility of Onondaga County to properly handle and dispose of the solid waste sludge(s) produced at the IWWTP. From my review of the treatment processes to be used at the IWWTP, we can expect that >99% of the PFAS entering the plant will be concentrated in those sludges. It's not clear to me whether all of this material will be sent to landfills; it appears that some biosolids could be spread on land. In any event, the county assumes all liability from disposing of these PFAS-contaminated materials. The county could face many lawsuits from PFAS contamination of properties near the land disposal sites. As but one example, the carpet industry in Georgia endured dozens of lawsuits from downstream communities due to their discharge of PFAS-contaminated wastewaters.⁴

3) The design is impractical

As a former Professional Engineer, I have to point out that the basic plan simply doesn't make good engineering sense. The IWWTP is to be constructed at the Oak Orchard sewage treatment plant, located two miles west of the Micron facility at the White Pine Commerce Park. Much of the treated wastewater will be pumped back to Micron for re-use at its facility. To do this requires the construction of a two-mile conveyance corridor across private properties, with a total of seven large pipes. (see attached Figure from the Micron FEIS) Of course large pumps have to be installed to send the water each way. And the electrical substation at Oak Orchard has to be expanded to accommodate the large electrical load of the IWWTP.

Why not put the IWWTP at the Micron campus, thereby minimizing the construction of pipelines, and reducing the need for an extra substation at Oak Orchard? Micron has ample space to build and ample electrical power brought in from National Grid.

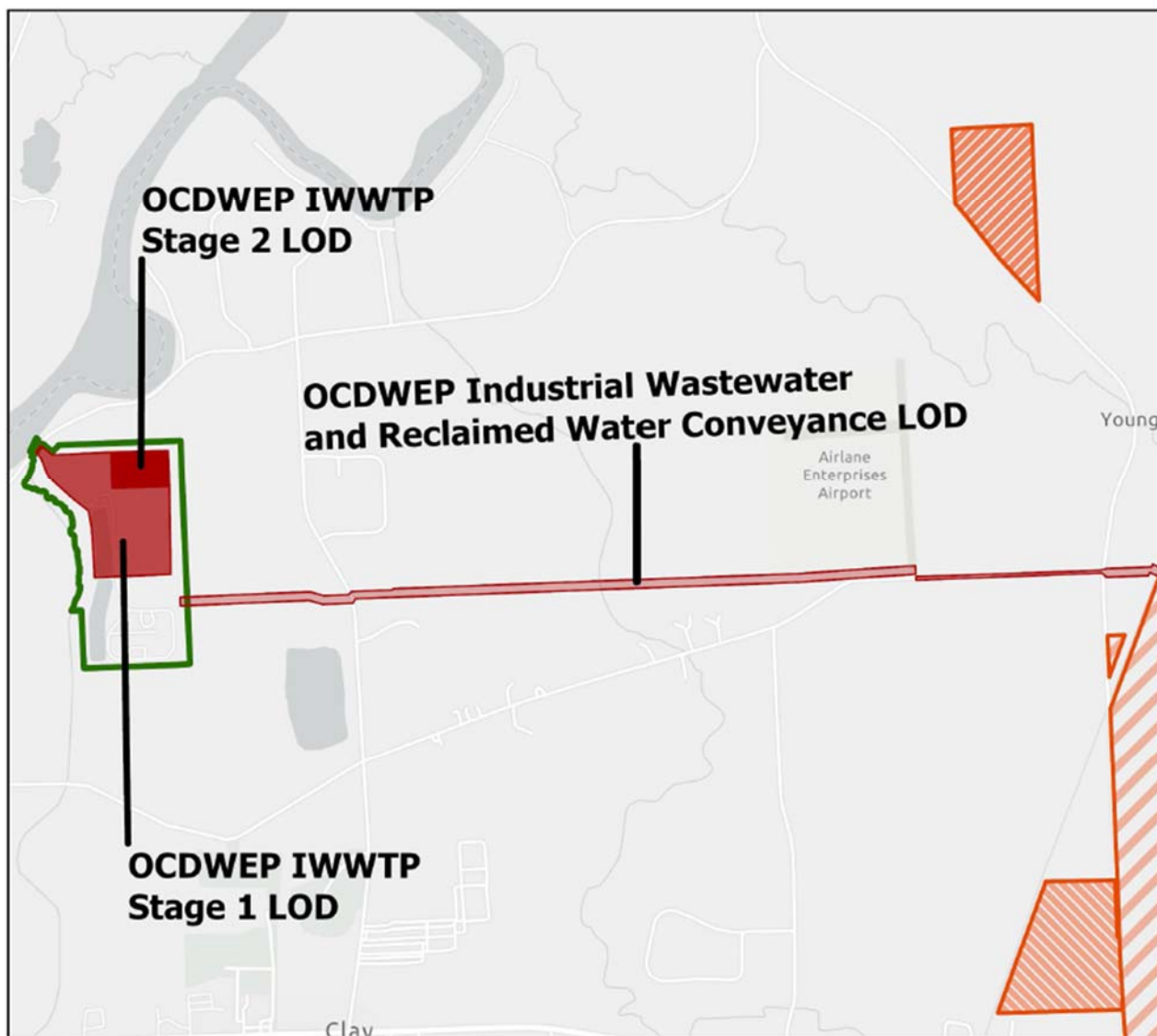
Thank you for the opportunity to provide comments. Feel free to contact me with any questions.

Donald J. Hughes, Ph.D.



⁴ See https://www.pbs.org/wgbh/frontline/documentary/contaminated-the-carpet-industrys-toxic-legacy/?utm_source=Iterable&utm_medium=email&utm_campaign=campaign_16702663&utm_Newsletter=FRONTLINE_Digest/

Figure 2.1-17 Proposed Industrial Wastewater and Reclaimed Water Conveyance



Water treatment plant for Micron

From Amanda Lyons [REDACTED]

Date Tue 2/24/2026 9:59 AM

To Office of the Onondaga County Legislature <ONONDAGACOUNTYLEGISLATURE@ongov.net>

NOTICE: This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

Dear Legislators,

I am writing to express my significant concerns regarding the proposed water treatment plant for the Micron site. As a resident living 1.5 miles from the future location, I am deeply worried about the environmental and economic long-term health of our community.

First, I am concerned about water safety and spill prevention. Following the recent sewage spill at Oak Orchard, the potential for a PFAS-related spill is alarming, as it would permanently contaminate our soil and water. I would like to know what specific safeguards and redundancies will be implemented to prevent and contain leaks, such as secondary containment linings or advanced monitoring systems. Furthermore, how will the effectiveness of the treatment be verified if the specific chemicals involved are proprietary?

Second, the financial risk to taxpayers is a major concern. While Micron is the beneficiary, the county remains ultimately responsible for the bonds. Given the history of large-scale projects like Destiny USA failing to meet expectations, what protections are in place if Micron does not fully build out or leaves the area before costs are recovered? With long-term tax exemptions and infrastructure costs currently borne by consumers and taxpayers, I believe Micron does not have enough "skin in the game" to ensure a long-term commitment to Clay.

I propose that Micron should build and operate the water treatment plant on-site. This would eliminate the risk of spills during transportation to Oak Orchard and ensure the operator knows exactly which chemicals to treat and monitor. This approach would demonstrate a long-term investment in our community, while the county, state, and DEC maintain strict oversight and accountability.

I urge you to carefully consider these environmental and economic points to protect the future of our area.

Sincerely,

Amanda Lyons

NOTICE: This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

Attached are additional comments and questions I have pertinent to the creation of the IWW district for Micron and the related proposed improvements which I would like to have included in the public hearing record. The questions included here may also be useful to pose to WEP at tomorrow's meeting of the Environmental Protection Committee. If I can be of any help to you or answer any questions you may have about what I have written, please do not hesitate to contact me.

John

John Przepiora, PE, retired/unregistered

President & Director

GreeningUSA, Inc.

GreeningUSA.org

SustainCNY.org

<image001.png>

*...Advocating for sustainable communities
to the benefit of local economies and environments.*

<image002.png>

...Working together for a sustainable CNY!

<IWW district formation comments of jprzepiora.pdf>

TO: Chair Watts and members of the Onondaga County Legislature

Sent via: onondagacountylegislature@ongov.net

FROM: John Przepiora

RE: Comments on the proposed IWW District

DATE: February 23, 2026

The recent assertion and disclosure by County Executive McMahon that the users of the IWWTP will pay all costs are steps in the right direction but still questions remain which must be satisfactorily answered before the County Legislature approves of the district and the related improvements.

According to reporting that appeared on Syracuse.com, “McMahon said the county or a related development corporation he established in 2024 would borrow money through bonds to build the plant. Micron would begin making payments as soon as bond payments come due, through a user agreement still being negotiated, he said.

“We’re not paying for a bond and bond interest before this thing opens and Micron starts paying user fees,” McMahon said. “With the user agreement with Micron, they would be paying the minute those bonds come online.”” ([McMahon: Micron will pay entire cost of billion-dollar industrial treatment plant - syracuse.com](#))

But while this clarification is a step forward, this still leaves numerous questions and details which should be answered and disclosed prior to agreeing to McMahon’s WW treatment plans.

1. What is the engineering cost associated with the IWWTP and who is paying for the engineering costs currently being incurred by

Onondaga County prior to the issuance of bonds to finance the project?

2. What safeguards will be in place to protect county residents from financial loss should users in the proposed IWW District be unable or fail to cover the IWW costs incurred by Onondaga County?
3. Will Onondaga County be held harmless from any sort of loss or damages (including pollution damages) that occur as a result of Onondaga County's design, construction and operation of the IWWT facilities?
4. Why is it that Micron doesn't construct and operate its own industrial wastewater treatment facilities on the White Pine campus? Why is it necessary for WEP to house, construct and operate facilities exclusively for Micron's benefit? While there may be other industrial customers potentially using the IWWT, Micron will be by far the largest and primary user. Should the tail wag the dog?
5. Critically, will treatment design and IWWTP operations prevent the discharge of the largely unregulated forever chemicals and other emerging highly hazardous chemicals from the environment? And relatedly, will Micron be willing to agree to pay whatever the cost for Onondaga County to protect the environment from currently poorly regulated chemicals of concern, presently and in the future?
6. While it is laudable that Onondaga County's sanitary Oak Orchard WWTP will be equipped with facilities to allow for water recycling and reuse by Micron, why is it process components and OOWWTP reconfiguration (such as elimination of lagoons, bridge project and MOPO components) necessary for the recycled water system have been included in the Oak Orchard WWTP upgrade already approved

(\$549M project approved in December, 2025)? Shouldn't a substantial portion of the OOWWTP upgrade be paid for by Micron? WEP should be tasked to clearly explain the components of this project and clarify what components are related exclusively or largely to Micron's needs.

7. The bonding of \$1.4B to \$2.6B should be considered in context of Onondaga County's overall financial needs. What is the impact of such a large sum on other county priorities and overall debt impact? Everyone is all excited that Micron will come and create a renaissance in CNY but as yet there are only promises and no commitments. While Micron has publicly stated they will create 9,000 jobs, the PILOT agreement negotiated by OCIDA requires just 4,500 jobs and there are as yet no guarantees about who will get those jobs, what they will pay and whether they will benefit the existing residents of the county, or whether county residents will only be in line for low paying service jobs which only contribute to the exacerbation of income inequality and maintain of a permanent underclass living lives in poverty.
8. Finally, yet not least, is the idea of environmental protection and long-term oversight of the industrialization of the northern suburbs of Onondaga County. Moving forward with infrastructure and financing mechanisms to support industrialization must not be done without an equally robust program for environmental oversight. Onondaga County must support and fund an independent means to monitor for pollution which could be detrimental to the health and welfare of residents. Management of such monitoring and public dissemination of results must be placed in the hands of an independent body free of political interference made up of experts in the field, citizen stakeholders and governmental officials that have

responsibility for environmental protection and public health. A good first step would be to upgrade the staffing and responsibilities of the County's Office of Environment to meet the challenges posed by semiconductor manufacturing.

Micron Waste Water Action Request

From Liz Tallman [REDACTED]

Date Wed 2/25/2026 5:34 PM

To Office of the Onondaga County Legislature <onondagacountylegislature@ongov.net>

Cc Ryan McMahon <ryanmcmahon@ongov.net>; ED-Micron <micron@ongov.net>

NOTICE: This email originated from outside of Onondaga County's email system. Use caution with links and attachments.

Dear County Legislators,

Please consider and act on these questions and concerns regarding finalizing agreements with Micron in Clay, and regarding the treatment of waste water and chemical sludge waste from the site.

1. It's my understanding that the processes sited for testing the Micron waste water and sludge (6-NYCRR part 371) will not test for many of the chemicals to be used. Also, the current "acceptable levels" will be high enough to still contaminate our waters and land. Please add to the testing, the specific chemicals and levels to be allowed to meet new safe standards, as well as any updates needed as time progresses. We must ensure that toxic chemical levels are detected and remediated before infecting the environment and our community. Finding contamination after the water is released back to the river is TOO LATE!

2. Since the industrial waste water treatment will be a separate district for Micron waste only, it makes most sense to have the plant be directly on their property to reduce the possibility of mixing or leaking over a 2 mile pipeline.

3. As technology is the fastest changing area of manufacturing, please supply concrete legal assurance that should the Micron Clay plants become obsolete or fail to expand to the expect 4 fabs, that the Onondaga County residents are not left holding bag, meaning both monetary and environmental responsibility. Tax relief and grants should not allow them to come and go without full payment and or remediation.

Without these failsafes, I invite each of you to purchase a home and raise YOUR children and grandchildren next to this site.!!

As a voting and taxpaying citizen living 1 mile from the Micron Clay site, I stand very concerned and fearful of the most certain long term risks facing us with this plant build and operation.

Please respond with a plan to keep us all safe while both we and Micron reap employment and profits from this venture.

Sincerely

Elizabeth Tallman

To: Onondaga County Chair Nicole Watts; Environmental Committee Chair Gregg Eriksen;
Planning & Economic Development Committee Chair Elaine Denton, and all county legislators

From: Lisa M. Druke

Date: February 26, 2026

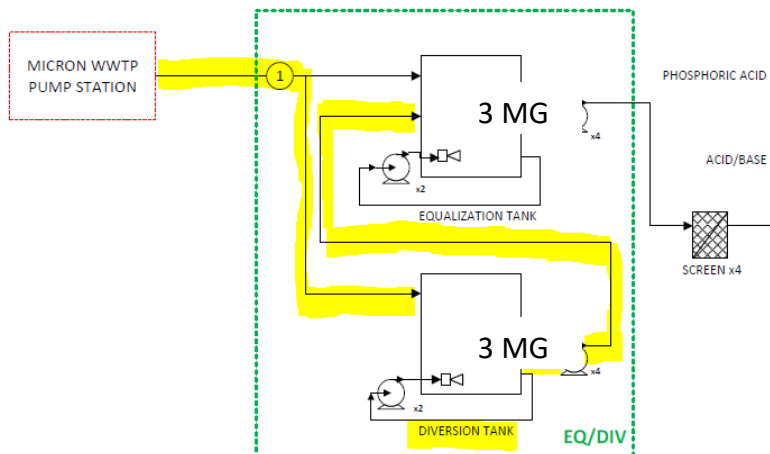
Re: Resolution for the creation of an Oak Orchard Industrial Sewer District

I do not oppose the Micron FAB development in Clay. However, I have concerns as there is very little information that has been shared about the Oak Orchard Industrial Wastewater Treatment Plant (IWWTP) including plant design, cost, treatment goals, why a sewer district needs to be created and the liability risks associated with creating the sewer district. One of the largest risks to the County and tax payers, I feel, relates to the County becoming liable as the owner of the IWWTP (as the POTW) with responsibilities for discharges from the plant once operation begins. The County should have a say and actively establish the site-specific treatment goals as they have the authority to do so for the influent to and discharge from the IWWTP that will protect our land and waters and keep us safe. The following pages summarize my concerns for establishing the industrial sewer district and recommendations for the County to establish influent limits in the IWDP and other discharge goals that will protect the County and the tax payers.

1. Micron’s WWTP effluent will be pumped ~2 miles to the Oak Orchard Industrial Wastewater Treatment Plant (IWWTP). The proposed design at the head of the IWWTP includes a 3 MG Diversion Tank to collect high or ‘out of spec water’ from Micron’s pretreatment plant which would then be slowly metered into the wastewater influent and treated through the IWWTP. Please see the concerns summarized below with a suggestion for a more conservative approach the County may consider for potentially a more stable operation of the plant.

Item	Reference	Liability concern	Risk mitigation recommendation
3 MG Diversion Tank (for out of spec water)	Brown & Caldwell, Figure H-1 Conceptual Alt. 10 Simplified Process Flow Diagram, (pdf p 182 and p. 8). IWWTP Conceptual Design Engineering Report, Brown & Caldwell	<p>The proposed design of the IWWTP includes a 3 MG diversion tank to collect high or ‘out of spec’ water from Micron’s pretreatment plant which would then be slowly metered into the wastewater influent and treated through the IWWTP. Follows are the liability concerns with this approach:</p> <p>a. The designed approach comes with greater risk for the overall treatment process at the IWWTP.</p> <p>b. The potential for out of spec discharges to the Oneida river may increase with metering in ‘out of spec’ wastewater coming from Micron.</p> <p>c. The current design puts more liability on the IWWTP operation staff to manage out of spec influent wastewater.</p> <p>d. There will be an Industrial Wastewater Discharge Permit (IWDP) in place on which Micron will be required to comply. The liability appears to be passed to the county to manage treatment of ‘out of spec’ wastewater.</p>	The County should consider discussing with Micron relocating the 3 MG Diversion Tank to Micron's facility instead of at the IWWTP. Micron could meter the ‘out of spec water’ back to the head of their WWTP (pretreatment to the IWWTP) when they have upsets. Should not allow ‘out of spec water’ to be sent to IWWTP as a standard practice.

FIGURE H-1: CONCEPTUAL ‘ALTERNATIVE 10’ SIMPLIFIED PROCESS Flow Diagram (page 182, Brown and Caldwell)



2. The FEIS Appendix L-1 states Micron is evaluating wastewater treatment technologies and their removal efficiencies to treat the matrix of potential compounds in their wastewater including a group of Per- and Polyfluoroalkyl Substances (PFAS). One class of short chain compounds Micron states they may use are FASAs. The concern with FASAs is they are considered PFAS precursors and may transform in wastewater treatment into more persistent forms that are harmful to human health. Please review the concerns below which focus on the FASAs likely to be used by Micron and recommendations for the County to consider to mitigate risk to the County as the POTW responsible for the IWWTP.

Item	Reference	Liability concern	Risk mitigation recommendation
FASAs (PFAS compound)	MicronNY FEIS Appendix L goto p L-19	One PFAS class that Micron states may be present in the wastewater coming from Micron facility is Perfluoroalkane sulfonamides (FASAs). FASAs are primarily used in photolithography and wet chemical processes and are likely to be used at Micron.	1. The County as the POTW should use their authority to establish actionable limits in the IWDP to include the compounds Micron is using in their process to prevent pass-through (i.e. FASAs and other compounds).
	Draft SPDES permit link, go to p 28-35	a. The FASAs class of compounds are not included in the Method 1633A list of 40 compounds to be monitored and are not included in the IWWTP (draft) SPDES permit. Without action by the County, it is anticipated that the FASAs may be excluded from any monitoring which is a concern.	2. For the County to consider establishing monitoring and control limits to include additional discharge testing for total PFAS such as: Total Organic Fluorine (TOF) or Extractable Organic Fluorine (EOF) and Adsorbable Organic Fluorine (AOF) [organofluorines EPA method1621]. 3. As a 'higher bar treatment goal' than the IWWTP SPDES permit, recommend actionable levels (i.e. 10 ng/L) for PFOA and PFOS, and other levels for compounds for waste water discharged to outfall 01B .
	FASAs National Institutes of Health (.gov)	b. Based on the characteristics of FASAs and the nature of biological treatment processes to be used by the IWWTP, an anoxic, aerobic and MBR system will not effectively remove FASAs from industrial wastewater, but it may partially transform them into more persistent perfluoroalkyl substances (PFAS) such as PFOS. This is a potential environmental and health risk.	4. [This may already be planned?] Implement zero liquid discharge treatment from Oak Orchard IWWTP. Recommend all effluent from IWWTP to undergo advanced treatment incl. ion exchange, decarbonation, reverse osmosis and brine concentration treatment → solids. All treated liquid waste is available for reuse by Micron.

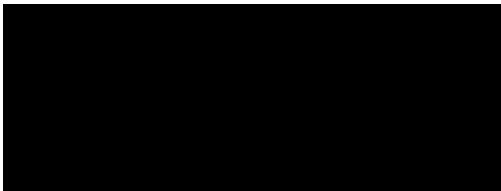
The creation of the Industrial Sewer District in Onondaga County may expose the county and the tax payers to liability from the harmful effects of the PFAS compounds and other contaminants of concern discharged from the IWWTP that may not be monitored and controlled. The County, as the owner of the IWWTP, has the authority through the regulatory framework to establish monitoring and control limits of influent water coming to their plant to prevent pass-through of these harmful PFAS and other contaminants of concern. The County should consult with their engineer and experts, and work with Micron to develop 'targeted treatment goals' for the IWWTP to ensure our land and waters will be protected. Other recommendations are also suggested to potentially improve the process. Lastly, if not already planned for the project, implementation of a zero liquid discharge strategy on the IWWTP (i.e. no or minimal liquid discharges to Oneida river) is recommended.

Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "LMD", with a horizontal line extending from the end of the signature.

Lisa M. Druke, BS Chem E, MBA




Oak Orchard Industrial Sewer District comments - Druke

From Lisa Druke [REDACTED]

Date Thu 2/26/2026 9:18 PM

To Office of the Onondaga County Legislature <onondagacountylegislature@ongov.net>; Gregory Eriksen <gregoryeriksen@ongov.net>; elaintenton@ongov.net <elaintenton@ongov.net>; Nicole Watts <nicolewatts@ongov.net>

 1 attachment (182 KB)

Druke_Oak Orchard Industrial Sewer District Letter_02 26 2026.pdf;

NOTICE: This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

Hello,

Please find attached my comments regarding the resolution to create an oak orchard industrial sewer district for your review. Please share with county legislatures.

Thank you.

Regards,

Lisa Druke
[REDACTED]

MEMORANDUM

TO: Onondaga County Chair Nicole Watts; Environmental Committee Chair Gregg Eriksen; Planning & Economic Development Committee Chair Elaine Denton, and all county legislators

FROM: Donald J. Hughes

DATE: February 23, 2026

Re: Resolution for the creation of an Oak Orchard Industrial Sewer District

I am writing to express my opposition to the proposed creation of an Oak Orchard Industrial Sewer District. I attended the joint meeting of your respective committees on February 16th. Cydney Johnson, Deputy County Executive for Physical Services emphasized that the creation of this district was primarily for servicing the wastewater needs of one user: Micron Technologies, Inc. She was asked, but was unable or unwilling, to provide answers to basic questions such as:

- How much will the proposed Industrial Wastewater Treatment Plant (IWWTP) cost?
- How will Micron repay the county for building and operating the IWWTP?
- Who will be responsible for meeting discharge limits?

I am not proposing that the Micron project be halted. Rather, I am calling on the Onondaga County Legislature to do its due diligence as an advocate for the health and financial wellbeing of the residents of the county. Creating this industrial sewage district is an essential first step towards having **the county**—not Micron—build a treatment facility specifically to treat Micron’s wastewater. My advice to you: Micron, not the county, should be solely responsible for treating its wastewater. Do not create an Industrial Sewer District.

Here are major concerns that I have:

1) Extremely high costs

The County Executive has consistently lowballed estimated cost of constructing the IWWTP, saying most recently that it would cost about \$1 billion. However, as reported on Syracuse.com, the county’s own consultants have estimated much higher costs. “ the county’s own consultants calculate the price tag between \$1.4 billion and \$2.6 billion.” (G. Coin article published Jan. 07, 2026)¹

Regardless of whether the final cost is \$1 billion or over \$2 billion, the fact stands that this wastewater plant is enormously expensive—far more than the county has spent on any

¹ <https://www.syracuse.com/micron/2026/01/microns-industrial-waste-costs-soar-for-treatment-plant-as-critics-point-to-little-environmental-review.html>

single project, including the upgrade of the Metro sewage treatment plant 20+ years ago. How would the county raise these funds?

Once built, the treatment plant will be very costly to operate because it uses advanced treatment processes like ultrafiltration and reverse osmosis.

These costs should be directly borne by Micron, not the county ratepayers! I call your attention to the fact that Micron is set to receive approximately \$25 billion in grants and tax credits from the Federal and New York state governments. In addition, Micron is making record profits. As reported in December 17, 2025 in Syracuse.com: "Micron's sales for the quarter that ends this month were \$13.6 billion, a record, the company said today. The previous record was set last quarter, with sales of \$11.3 billion. Micron made a \$5.2 billion profit this quarter."²

2) Who is responsible for environmental compliance?

With the creation of an industrial wastewater district, the county will be operating the IWWTP. Complying with the SPDES discharge permit will be completely the responsibility of Onondaga County's Department of Water Environment Protection. I am not confident in the Department's abilities to build and operate new facilities after the recent debacle with the sewage sludge drying facility at the Metro treatment plant.

In any case, why should the County be held responsible for fully treating Micron's wastewater? The company has acknowledged its wastewater will contain PFAS—so-called "forever chemicals"—which are highly toxic, very difficult to filter out, and almost impossible to break down. Micron's Final Environmental Impact Statement, Appendix L-1³ notes that

Wastewater at the Micron Campus may include a mix of the following types of PFAS in ppt-level concentrations: perfluoroalkyl carboxylic acids, perfluorosulfonic acids, fluorotelomer sulfonic acids, perfluoroalkane sulfonamides, perfluoroalkane sulfonamidoacetic acids, perfluoroalkane sulfonamide ethanols, per- and polyfluoroether carboxylic acids, ether sulfonic acids, and fluorotelomer carboxylic acid (SIA 2025).

In addition to PFAS, there are other industrial compounds identified in Micron's wastewater which must be treated. This includes mercury and tetramethyl ammonium hydroxide (TMAH) which are also resistant to treatment and are toxic. Under the proposed

² <https://www.syracuse.com/micron/2025/12/micron-again-reports-record-sales-as-ai-market-continues-to-boom.html>

³ FEIS, dated Nov. 7, 2025. Appendix L-1 Use, Management, and Disposal of Per- and Polyfluoroalkyl Substances at the Micron New York Semiconductor Fabrication Facilities

plan, the county will assume all responsibility for making sure the water discharged to the Oneida River from the IWWTP meets all limits set by the state DEC.

Furthermore, it will be the responsibility of Onondaga County to properly handle and dispose of the solid waste sludge(s) produced at the IWWTP. From my review of the treatment processes to be used at the IWWTP, we can expect that >99% of the PFAS entering the plant will be concentrated in those sludges. It's not clear to me whether all of this material will be sent to landfills; it appears that some biosolids could be spread on land. In any event, the county assumes all liability from disposing of these PFAS-contaminated materials. The county could face many lawsuits from PFAS contamination of properties near the land disposal sites. As but one example, the carpet industry in Georgia endured dozens of lawsuits from downstream communities due to their discharge of PFAS-contaminated wastewaters.⁴

3) The design is impractical

As a former Professional Engineer, I have to point out that the basic plan simply doesn't make good engineering sense. The IWWTP is to be constructed at the Oak Orchard sewage treatment plant, located two miles west of the Micron facility at the White Pine Commerce Park. Much of the treated wastewater will be pumped back to Micron for re-use at its facility. To do this requires the construction of a two-mile conveyance corridor across private properties, with a total of seven large pipes. (see attached Figure from the Micron FEIS) Of course large pumps have to be installed to send the water each way. And the electrical substation at Oak Orchard has to be expanded to accommodate the large electrical load of the IWWTP.

Why not put the IWWTP at the Micron campus, thereby minimizing the construction of pipelines, and reducing the need for an extra substation at Oak Orchard? Micron has ample space to build and ample electrical power brought in from National Grid.

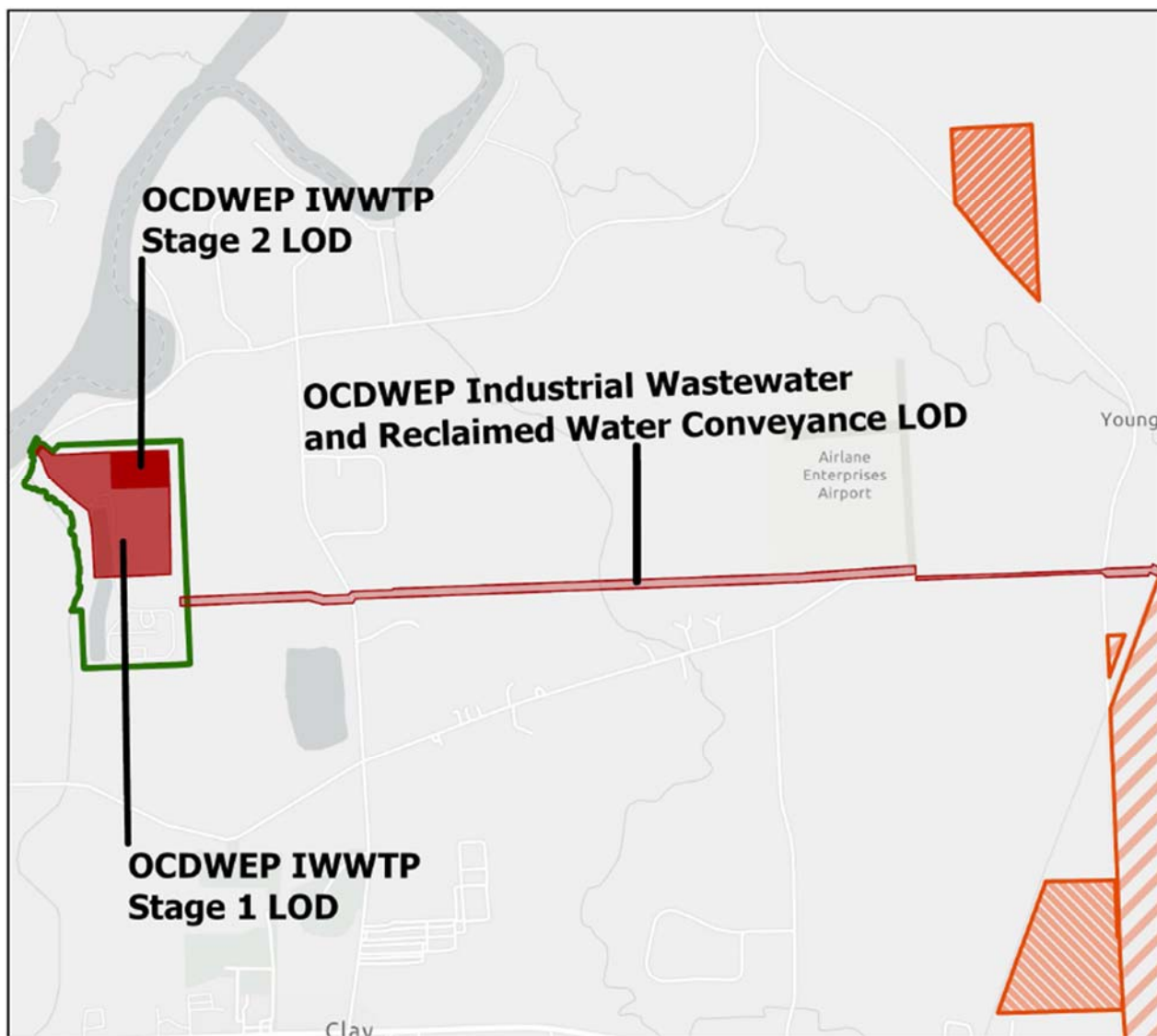
Thank you for the opportunity to provide comments. Feel free to contact me with any questions.

Donald J. Hughes, Ph.D.



⁴ See https://www.pbs.org/wgbh/frontline/documentary/contaminated-the-carpet-industrys-toxic-legacy/?utm_source=Iterable&utm_medium=email&utm_campaign=campaign_16702663&utm_Newsletter=FRONTLINE_Digest/

Figure 2.1-17 Proposed Industrial Wastewater and Reclaimed Water Conveyance



From: Don Hughes [REDACTED]

Sent: Friday, February 27, 2026 11:21 AM

To: Gregory Eriksen <gregoryeriksen@ongov.net>; Elaine Denton <ElaineDenton@ongov.net>; Nicole Watts <NicoleWatts@ongov.net>

Subject: Re: Comments on Industrial Wastewater District in T. of Clay

NOTICE: This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

One additional note: Every day, it seems, new information comes out about the toxicities of various PFAS. Here's an article that was just sent to me today.

<https://www.healthday.com/health-news/pregnancy/newborns-exposed-to-more-forever-chemicals-than-once-thought>

Donald J. Hughes, Ph.D.

[REDACTED] =====

=====

"dans les champs de l'observation, le hasard ne favorise que les esprits préparés" ("In the field of observation, chance favors only the prepared mind") **Louis Pasteur**, French chemist and microbiologist (1822 -1895)

On Fri, Feb 27, 2026 at 11:16 AM Don Hughes [REDACTED] wrote:
dear legislators Denton, Eriksen and chair Watts:

I submitted comments about the proposed creation of the Industrial Sewage District in Clay on Feb. 23rd. I hope you had a chance to read them. I very much appreciate the extension of the public hearing to March 3rd. I want to distill my comments into several key points, and bring up something that I neglected to include in my written comments.

I believe the legislature should NOT agree to creating this district because it paves the way for Micron to send its wastewater to a county-owned and operated industrial wastewater treatment plant (IWWTP). Having the county build and operate the IWWTP is problematic on multiple levels:

1. It is very expensive. "the county's own consultants calculate the price tag between \$1.4 billion and \$2.6 billion." Ryan McMahon & Cydney Johnosn have claimed that Micron "will pay for it" but details have yet to be worked out. Operating the plant will also be very expensive, since it will use energy-intensive technologies like ultrafiltration and R.O.
2. Why should the County be held responsible for fully treating Micron's wastewater? There's a witch's brew of toxic chemicals coming out of the Micron plant, including hundreds of types of PFAS--notoriously toxic and difficult to break down. Any hiccups in the fabrication process at the Micron facility will have to be mitigated at the county's IWWTP. All industrial operations experience hiccups due to equipment malfunctions, operator errors, etc. Will the county be prepared to deal with these?
3. Micron will be re-using a large portion of the treated wastewater, so it has to be pumped back to Micron's campus at White Pine Commerce Park, a distance of two miles.
4. The IWWTP will generate a significant amount of sludge--biosolids and solid residues from the RO process. The hundreds of PFAS and other hazardous chemicals will be concentrated in those sludges because they are not broken down in the preceding treatment steps. The county will be responsible for disposing of those solids, and I expect will be liable for any future contamination issues arising from disposal of those sludges. This is not a theoretical consideration: there are hundreds of lawsuits that have arisen due to PFAS leaching out of landfills, land application sites, etc. As Exhibit A I invite you to watch the movie "Dark Waters" which revolves around a lawsuit brought against PFAS contamination from a Dupont landfill in W. Virginia. (Mark Ruffalo and Anne Hatheway star in it. It's really quite riveting!)

There is a better way. Have Micron build the IWWTP at its campus in Clay. It makes far more sense for them to pay for it directly, operate it, reuse the treated water right there, and assume liability for the solid wastes. They would send the treated effluent through a single pipeline to the Oneida River.

Please don't hesitate to reach out if you have further questions. My cell is 315-395-1887.

respectfully,
Don Hughes

Donald J. Hughes, Ph.D.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

=====

"dans les champs de l'observation, le hasard ne favorise que les esprits préparés" ("In the field of observation, chance favors only the prepared mind") **Louis Pasteur**, French chemist and microbiologist (1822 -1895)

On Tue, Feb 24, 2026 at 12:01 AM Don Hughes [Redacted] wrote:
Please see attached comments.

Donald J. Hughes, Ph.D.

[Redacted]

=====

"dans les champs de l'observation, le hasard ne favorise que les esprits préparés" ("In the field of observation, chance favors only the prepared mind") **Louis Pasteur**, French chemist and microbiologist (1822 -1895)

Contact the Onondaga County Legislature

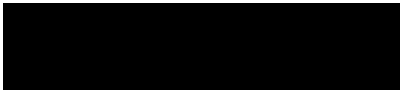
From SONIA KRAGH <onondagacountylegislature@ongov.net>

Date Sun 3/1/2026 8:57 AM

To Office of the Onondaga County Legislature <onondagacountylegislature@ongov.net>

NOTICE: This email originated from outside of Onondaga County's email system. Use caution with links and attachments.

Name: SONIA KRAGH

Your Email Address:: 

Question or Comment: :

My comments relate to the proposed establishment of an Oak Orchard Industrial Sewer District which is up for public comment and potential vote on 3March2026.

I recommend voting NO to establishing this district.

This district is being established to serve one customer, Micron, so that an Industrial Wastewater Treatment Plant can be built to process all the chemicals and water needed in Micron's chips manufacturing process. I.e. this district is being established for a chemical plant's waste. The Industrial Wastewater Treatment Plant should be owned, constructed and operated by Micron. Chip manufacturing is a HIGHLY technical process, involving hundreds if not thousands of toxic chemicals and Micron will not release a list of what is being used, as its process is "proprietary". The public and likely the elected officials are currently "blind" as to what may be required to safely remove and dispose of all chemicals. Why should we take on this liability?

I am a member of Sustain CNY and chair the Micron monitoring Subcommittee of the Environmental Committee reviewing Micron's environmental processes. We have several experts on our committee who are career experts on wastewater, chips industry and toxic waste clean up. We have spent countless hours reviewing Micron's Industrial Treatment Plant's engineering designs which as they stand now will not reliably remove all chemicals, some which may discharge into the Oneida River. This has to be done right! It is not the same as sanitary wastewater treatment plants. Toxic discharges into the Oneida River will pollute that river, ground water, the Oswego river and ultimately Lake Ontario which is a shared lake with Canada.

Onondaga County should not take on the financial or legal responsibility of managing the industrial wastewater from Micron. Setting up an Industrial Sewer District is the first step to do that.

Please vote NO to establishing an Industrial Sewer District.

Our committee would be happy to meet with you to brief you on our understanding of the Industrial Waste Water Treatment Plant based on current designs included in the EIS and permitting processes. Ultimately our goal is the same as yours-to ensure that our community remains healthy while Micron joins our community as a business partner.

Sincerely, Sonia Y Kragh, MD, Chair, Sustainability Climate Change Awareness and Action, Chair, Micron Monitoring Subcommittee, SustainCNY



From: **Lisa Warnecke** [REDACTED]
Date: Tue, Feb 17, 2026 at 11:57 AM
Subject: Storm drainage and floodplain impact of micron etc
To: Lisa Warnecke [REDACTED]

Who is incorporating everything heard this morning about all the public and private developments impact on drainage and flooding over the multiple county area, including Oswego for example?

Certainly a plan and drainage infrastructure is needed. Who will be responsible for doing and funding such necessary work? Details are needed for this and WEP plans.

Fwd: OCWA and WEP presentations now....how will all the work be financed, etc?

----- Forwarded message -----
From: **Lisa Warnecke** <[REDACTED]>
Date: Tue, Feb 17, 2026 at 11:31 AM
Subject: OCWA and WEP presentations now....how will all the work be financed, etc?
To: Lisa Warnecke <[REDACTED]>

OCWA by Jeff, executive director. Will work include needs for all fabs and full build out of white pines too? Financing?

Impact on drainage, floodplain? Live stream on line until 1.30 pm.

Finally OCWA had a professional presentation using public data and their internal GIS capacity to create informative maps. WEP less so.

Why wasn't public data from county, SMTC, CNYRPB, Clay etc and GIS capabilities on maps used for the housing presentation? Hopefully the county is using internally generated data, GIS and other capabilities for decision-making.

Thanks much for your insight and suggestions
Lisa

Contact the Onondaga County Legislature

From Martha Viglietta <onondagacountylegislature@ongov.net>

Date Sun 3/1/2026 3:53 PM

To Office of the Onondaga County Legislature <onondagacountylegislature@ongov.net>

NOTICE: This email originated from outside of Onondaga County's email system. Use caution with links and attachments.

Name: Martha Viglietta

Your Email Address:: 

Question or Comment: :

I am concerned about the County agreeing to build pay for and operate a wastewater treatment facility for Micron. I would also like to have a longer period of time for the legislature to deliberate on this issue, and particularly to receive comments from the community, and consider those comments in their decisions.

Why is Micron not building its own treatment plant, and why not build it much closer to the fabs? My understanding from the beginning of this process was that Micron was committing to take care of its own waste water. The kinds of toxins that will result from the chemical processes in the plant will be foreign to our wastewater treatment department, I would imagine. I have heard that forever chemicals like PFAS will be abundant in the wastewater. Micron should be fully responsible for the effective remediation of all of its own waste water.

Thank you.

Micron Wastewater

From WENDY YOST 

Date Sun 3/1/2026 7:55 PM

To Office of the Onondaga County Legislature <legislature@ongov.net>

NOTICE: This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

There are many concerns about the Onondaga County taking on the responsibility of treating Micron's industrial waster, which contains highly toxic PFAS chemicals, some of which they say they can't disclose.

1. Can the county truly and safely manage industrial waste?

Experts like Don Hughes are not convinced the county can adequately perform advanced toxic industrial waste treatment.

2. There will be increased energy demand and leakage risks, from passing waste through 2 miles of pipes.

3. All the wastewater will be transported 2 miles from Micron's campus to Oak Orchard, then the ultra-processed water returned to Micron. This transfer requires significant energy use, as does installing and maintaining the pipes. Further, all pipes eventually leak. The surrounding soils can be subject to "soil heave" from weather extremes. Moving soils can break pipes, as we saw from this winter's huge water main break affecting 'Onondaga County Water Authority' (OCWA).

4. No one has given reasons why the Legislature must approve this district now. Last November, Micron delayed their project here in Clay by 2 to 3 years.

5. No specifics agreements have been made or who will pay or how much the treatment facility will cost. Estimates made by consultants vary widely from 1.4 to 2.6 billion.

6. It is not clear if the county or the Micron will be liable for damages related to spills.

7. There has been no environmental impact study of this part of the project that is base on transporting the water.

The legislature should vote No for now on the current plan for wastewater treatment.

Wendy Yost


Oak Orchard Treatment Plant

From Ronald Monsour [REDACTED]

Date Sun 3/1/2026 8:08 PM

To Office of the Onondaga County Legislature <legislature@ongov.net>

NOTICE: This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

I respectfully ask that this proposal be tabled.

Wastewater Treatment Plant

From Mary Monsour [REDACTED]

Date Sun 3/1/2026 8:51 PM

To Office of the Onondaga County Legislature <legislature@ongov.net>

NOTICE: This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

Please vote No on the Oak Orchard Industrial Sewer District. It makes more sense for Micron to build and operate the industrial wastewater treatment plant.

Comments on sewer district proposal

From Meghan Yeomans [REDACTED]

Date Mon 3/2/2026 8:53 AM

To Office of the Onondaga County Legislature <legislature@ongov.net>

NOTICE: This email originated from outside of Onondaga County's email system. Use caution with links and attachments.

Hi,

I am writing to urge you to vote NO on the sewer district proposal for Micron. I trust the experts and their assessment of potential damage (leaking pipes, toxic chemicals pollution, and financial responsibility on the county, etc) more than profiteers.

At least the process can be slowed or delayed to be sure it is ethical and in the best interest of our community and not just Micron.

Thank you,

Meghan Yeomans
[REDACTED]

Sent from my iPhone

Environmental Comments about Micron

From Glenn Griffin [REDACTED]

Date Tue 3/3/2026 6:01 AM

To Office of the Onondaga County Legislature <legislature@ongov.net>

NOTICE: This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

Hey!

I feel that the upcoming chip factories must have stricter emissions control. There must be dialogue about how to reduce any harmful emissions and greenhouse gases which may be created as a byproduct of chip production. There must be a recycling program at the Micron factory to reduce all trash and industrial waste. I feel that both Micron and Onondaga County should collaborate and research to see if a smart grid could bring better electricity supply to the region while also powering the chip factories. A smart grid is an electricity network that uses communications and sensors to monitor and manage both energy supply and demand. I also wish that the upcoming chip factories utilise carbon neutral materials whenever possible.

Sincerely, Glenn Griffin

Please distribute the following to all the Onondaga County legislators prior to the Legislative session on March 3rd. I ask that you incorporate these comments into the public record for the associated public hearing.

respectfully,

Donald J. Hughes, Ph.D.



=====
"dans les champs de l'observation, le hasard ne favorise que les esprits préparés" ("In the field of observation, chance favors only the prepared mind") **Louis Pasteur**, French chemist and microbiologist (1822 -1895)

dear legislators and chair Watts:

I submitted comments about the proposed creation of the Industrial Sewage District in Clay on Feb. 23rd. I hope you had a chance to read them. I very much appreciate the extension of the public hearing to March 3rd. I want to distill my comments into several key points, and bring up something that I neglected to include in my written comments.

I believe the legislature should NOT agree to creating this district because it paves the way for Micron to send its wastewater to a county-owned and operated industrial wastewater treatment plant (IWWTP). Having the county build and operate the IWWTP is problematic on multiple levels described below.

At a minimum, I request that a vote on Mr. Eriksen's resolution at least be delayed until the April legislative session so that legislators and interested parties have ample time to read public comments submitted up until the close of the public hearing on March 3rd.

Comments on the Resolution to establish an Industrial Wastewater District in Clay, NY:

1. It is very expensive. According to reporting on [syracuse.com](https://www.syracuse.com/micron/2026/02/mcmahon-micron-will-pay-entire-cost-of-billion-dollar-industrial-treatment-plant.html) (<https://www.syracuse.com/micron/2026/02/mcmahon-micron-will-pay-entire-cost-of-billion-dollar-industrial-treatment-plant.html>) "The county's own consultants calculate the price tag between \$1.4 billion and \$2.6 billion." Ryan McMahon & Cydney Johnson have claimed that Micron "will pay for it" but details have yet to be worked out. Operating the plant will also be very expensive, since it will use energy-intensive technologies like ultrafiltration and R.O.

So far, no details have been provided as to the fiscal arrangements between Micron and the county. Supposedly the creation of the industrial wastewater district provides a mechanism for billing Micron. What is that mechanism? There is no mention of financial obligations in the Resolution under consideration.

Has the county ever created an industrial wastewater district in the past for such a purpose? In the past the county has had large industries, such as Bristol-Myers (later Bristol-Myers-

Squibb) which discharged large quantities of industrial waste into the sewer system. I am not aware of any special districts having been set up for them.

2. Why should the County be held responsible for fully treating Micron's wastewater?

There's a witch's brew of toxic chemicals coming out of the Micron plant, including hundreds of types of PFAS--notoriously toxic and difficult to break down. Any hiccups in the fabrication process at the Micron facility will have to be mitigated at the county's IWWTP. All industrial operations experience hiccups due to equipment malfunctions, operator errors, etc. Will the county be prepared to deal with these?

3. Micron will be re-using a large portion of the treated wastewater, so it has to be pumped back to Micron's campus at White Pine Commerce Park, a distance of two miles. From a design and liability point of view, it makes little sense to send the wastewater and treated water back-and-forth.

4. The IWWTP will generate a significant amount of sludge--biosolids and solid residues from the RO process. The hundreds of PFAS and other hazardous chemicals will be concentrated in those sludges because they are not broken down in the preceding treatment steps. The county will be responsible for disposing of those solids, and I expect will be liable for any future contamination issues arising from disposal of those sludges. This is not a theoretical consideration: there are hundreds of lawsuits that have arisen due to PFAS leaching out of landfills, land application sites, etc. As Exhibit A I invite you to watch the movie "Dark Waters" which revolves around a lawsuit brought against PFAS contamination from a Dupont landfill in W. Virginia. (Mark Ruffalo and Anne Hatheway star in it. It's really quite riveting!)

There is a better way. Do not create a district. Rather, let Micron build the IWWTP at its campus in Clay. It makes far more sense for them to pay for it directly, operate it, reuse the treated water right there, and assume liability for the solid wastes. They would send the treated effluent through a single pipeline to the Oneida River.

Please don't hesitate to reach out if you have further questions.

respectfully,
Don Hughes

Donald J. Hughes, Ph.D.



Re: Comments on proposed industrial wastewater district in Clay

From Office of the Onondaga County Legislature <OnondagaCountyLegislature@ongov.net>

Date Tue 3/3/2026 10:04 AM

To [REDACTED] Office of the Onondaga County Legislature
<onondagacountylegislature@ongov.net>

Cc Glenn Coin <gcoin@syracuse.com>

Confirming Receipt of your Public Comment.

From: Paul Doody [REDACTED]

Sent: Monday, March 2, 2026 4:52 PM

To: Office of the Onondaga County Legislature <onondagacountylegislature@ongov.net>

Cc [REDACTED]

Subject: Comments on proposed industrial wastewater district in Clay

NOTICE: This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

Attached are my comments on the proposed industrial wastewater district in Clay, NY. Please confirm receipt of these comments and feel free to reach out with any questions or if you would like to discuss any of the comments. Thank you for the opportunity to comment.

P

[REDACTED]

Comments on Proposed Industrial Wastewater District

Submitted to Onondaga County Legislature (March 2, 2026)

I appreciate the opportunity to provide comments on the proposal to establish an Industrial Wastewater District in Clay, NY to facilitate acceptance and treatment of industrial wastewater from the Micron Semiconductor Facility sited at the White Pines Industrial Park along Route 31 in Clay, NY. My name is Paul Doody, residing at [REDACTED] [REDACTED] Baldwinsville, NY [REDACTED]. I am a retired chemical/environmental professional engineer (NY P.E. 067405) and spent my early career working for IBM as a Facilities Engineer at their semiconductor facility in East Fishkill, NY followed by 35 years as an environmental consultant addressing contamination at numerous hazardous waste sites with specialization in addressing contaminated aquatic sites. I also have experience in risk management associated with my work as an environmental consultant. I provided verbal comments at the February 17, 2026 public hearing. The comments provided herein are my own personal comments and provide additional details in support of those verbal comments, as well as some additional comments. If there is any discrepancy the comments provided herein shall supersede my verbal comments.

First and foremost, I recommend that the county legislature not accept responsibility for treating Micron's industrial wastewater. We are taking on unnecessary risk and liability that Micron should be responsible for. However, if there have been previous legal agreements that the county cannot back out of then I am providing some initial identification of, and in some cases recommendations to help mitigate potential risks and liabilities. Finally, I would welcome the opportunity to engage in a dialogue with the legislature, WEP or its engineers to discuss any details regarding my comments and concerns.

Summary of Comments

1. I am recommending that the County Legislature delay any vote on the proposed industrial wastewater district until all necessary information is available to address concerns from the legislature as well as address all comments provided by the public.
2. I am very concerned with the unnecessary risks and liability the county and its taxpayers are taking on by accepting and treating industrial wastewater from Micron. In my opinion Micron should treat its own wastewater on its property for recycle or discharge under a Micron-owned NY SPDES discharge permit. It is unnecessary to accept the liability as Micron should be fully responsible for its own wastes.

3. I recommend that the portion of the proposed wastewater district south of Route 31 be excluded from the district up and until it is known what industry(ies) plan(s) to establish an operation at that location and the need for industrial wastewater treatment can be fully assessed.
4. The lack of detail on Micron's chemical usage and planned pretreatment of its wastewater must be resolved before the county agrees to accept and treat the wastewater.

The remainder of my comments provide additional detail in support of the four summary comments listed above.

1. The vote on establishing the industrial wastewater district should be delayed until adequate information is available

It's critical that the legislature have all necessary information to address all concerns both the legislature and the public have before voting on establishing the industrial wastewater district. My key concerns with having the county transport and treat Micron's industrial wastewater are described in subsequent sections but generally include the following:

- The legislature must ensure Micron is going to pay for the construction, operation and maintenance as well as decommissioning in the future, regardless of what those costs amount to. The legislature needs to clearly make sure taxpayers and users are not going to see increased costs due to the county accepting and treating Micron's industrial waste.
- The legislature must fully identify the risks and understand the liabilities the county is taking on by accepting and treating the wastewater (see additional discussion under Item 2). Adequate mitigation efforts must be established to minimize the risks and liabilities.
- The legislature must assess and address the public comments received. The due date of March 3 for comments does not allow enough time for the legislature to assess and address them in time to facilitate a vote on March 3, 2026.
- What obligations does establishing the district impose on the county? Is the county then obligated to accept industrial wastes from all future occupants within the district? If the answer is yes then the legislature must delay the vote until comments can be fully assessed and addressed.

2. Accepting and treating industrial wastewater creates unnecessary risks and liability to the county (and its taxpayers)

I believe that the county is taking on unnecessary risk and liability and should not be accepting and treating Micron's industrial wastewater. Micron should take full

responsibility for its own industrial wastewater, including collection, treatment and discharge in accordance with its own NY SPDES discharge permit. I have preliminarily identified a number of risks and liabilities that should be considered, as summarized below:

- There are risks and liabilities associated with the costs for construction of the facility, training for operators and general construction risks. Based on a January 11, 2026 article in Syracuse.com (Micron's industrial waste: Costs soar for treatment plant as critics point to little environmental review) I understand Brown and Caldwell, an engineering firm retained by the county to perform a conceptual engineering design analysis of the industrial wastewater treatment system, has estimated the construction costs to be on the order of \$1.4 Billion to \$2.6 Billion (which were much higher than earlier estimates of \$500 Million). In the same article Ryan McMahon is quoted as saying "I continue to use the billion-dollar number, under no circumstances can there be a \$2.7 billion industrial project or else there just won't be a project. That's just a fact." In more recent articles over the past week where Ryan McMahon has indicated that Micron will pay for the full treatment system he continues to state the \$1 billion estimated cost. The question remains as to what happens if costs actually end up above "the \$1 billion number"? Will Micron pay no matter the cost or is there some maximum value that Micron won't pay beyond, in which case who pays the difference? Well of course the county and rate payers and/or taxpayers will. The county cannot accept the liability for costs that Micron refuses to pay. Most importantly the system needs to be designed and constructed with adequate redundancy and reliability to ensure continuous treatment and that discharge requirements can be met. It will cost what it needs to cost to be done right and minimize risks to the county. The best approach in my opinion is to have Micron treat its own industrial wastewater on its property and discharge treated water under their own NY SPDES permit. They can accept all the cost risks, and control their own costs. If the county still decides to treat Micron's industrial wastewater, the agreement must be crystal clear that Micron will pay whatever the costs end up being for the construction, training, startup and operation of the facility. In addition, Micron should provide legally binding financial assurances that they will pay for the decommissioning and demolition of the facility at the end of its useful life. Any cost estimates that are used in legal agreements must include an adequate contingency.
- If the system is constructed and Micron backs out of the project in Clay will they pay for all costs incurred as of that date by the County? This could present significant liability to the county and its rate payers and taxpayers.
- The current treatment plant proposed by Brown and Caldwell (described in its November 2025 report Conceptual Design Engineering Report - CDER) includes

several treatment components that are not typically employed in municipal wastewater treatment. As such, there are increased risks of problems during operations so adequate training and maintenance of the systems is imperative.

- There are always risks associated with construction, both monetary and health and safety risks the county is taking on.
- There are potentially significant risks related to unforeseen, inadvertent discharges associated with unacceptable contamination from Micron, equipment malfunctions, system leaks, etc. These could include superfund liability if discharges result in unacceptable human health and environmental risks in the Oneida River, Oswego River and/or Lake Ontario. The county could be identified as a responsible party requiring legal defense and potential cost liability for cleanup. There are also risks to OCWA's water intake if unacceptable contaminant levels reach the water intake just west of the Oswego River discharge.
- There are risks associated with PFAS (commonly referred to as forever chemicals) and other currently unregulated chemicals. Based on the process flow diagrams developed by Brown and Caldwell it appears that both the bridge project for FAB1 and the combined FAB1/FAB2 alternative will be discharging wastewater with only biological treatment for the industrial wastewater. PFAS and other recalcitrant compound do not break down with biological treatment so any PFAS in the wastewater from Micron will be discharged to the Oneida River. If this results in unacceptable risks in the Rivers and Lake Ontario they could create liability to the county as described in the prior bullet.
- I recommend that the county evaluate whether a FAB1 bridge project is necessary given the revised schedule Micron released in late 2025 (i.e., pushed out startup by a couple years). It's possible a single project (i.e., Alternative 11 in Brown and Caldwell's CDER) could be implemented reducing schedule risks with two individual projects.
- Micron has refused to disclose its chemical usage to the public, so the county must ensure it and its engineers are fully informed about the chemicals to be discharged to county. The list of chemicals provided in the SPDES permit application (identified by Micron as being worst case concentrations) must be ground-truthed and independently confirmed.
- It appears quite illogical to pipe 33.5 MGD over two miles from Micron's facility to the Oak Orchard facility, then return treated wastewater over two miles back to Micron for reuse. There are risks from pipeline breaks between Micron and Oak Orchard. Brown and Caldwell's CDER indicates that the county will have ownership of the 7 force mains (three 30-inch and four 20-inch lines – three of which are redundant backup lines). The two 30 inch lines will be transporting industrial wastewater from the Micron facility to the Oak Orchard facility. Any

leaks associated with pipe breaks or small unnoticeable leaks could contaminate groundwater or reach the Oneida River untreated creating potential liability for the county. I would recommend that Micron take full responsibility for these pipelines, not the county. This won't necessarily reduce the risks but it would avoid the county accepting them. I would also recommend that secondary containment be evaluated as mitigation for the raw industrial wastewater lines to mitigate for potential pipeline leaks. Obviously the simplest mitigation is to have Micron treat its industrial wastewater at the Micron facility, reuse as much treated water as possible and only pipe adequately treated industrial wastewater to the Oneida River under its own NY SPDES permit.

- There are risks associated with violations of the county's NY SPDES permit, either due to problems with the treatment system or exceedances from Micron. In either event notices of violation (and any potential fines) would be issued to the county.
- I would note that the issues which have arisen with the sludge drying facility the county constructed help demonstrate some of the issues that come up with projects like this. There were cost overruns and difficulties with startup and operations (toxic air worker exposure).
- There are risks associated with the construction and startup schedule of the industrial wastewater treatment system. Will the county be liable for business interruption costs to Micron if the facility cannot be operational in time to accept wastewater from Micron? In addition, if problems arise during operations that prevent Micron from discharging all its industrial wastewater will the county be liable for business interruption costs? I would note that there are only four hours of equalization time proposed at the county's treatment system which does not provide much emergency storage. Given the anticipated flow rates from Micron (i.e., 33.5 MGD with all four FABs) it will be challenging to provide significant emergency storage at the Oak Orchard property. Micron should consider providing adequate emergency storage at Micron's plant site (where more space is available) to mitigate this risk.
- The county should implement a thorough risk management assessment to catalogue all identifiable risks, prioritize the risks and establish mitigation efforts with responsibility for higher priority risks. It will be important that all stakeholders participate and contribute to this process including the county and its engineers, Micron and its engineers, the Town of Clay and the community. If the county does not have a protocol for such a process, I would be happy to share a process I have used on numerous projects. The results will help the county better assess whether taking on the responsibility for treating Micron's industrial wastewater is warranted. I do believe that if the county proceeds with treating Micron's industrial wastewater it is imperative that adequate indemnification be provided

from Micron to the County, as a mitigation element in the risk management assessment.

3. The inclusion of the parcel south of route 31 should be deferred

It is currently unknown if and what industries might develop in the area south of Route 31. As such we don't know the nature of operations, chemical usage or characteristics of wastewater. In addition, the current industrial treatment system identified by Brown and Caldwell does not include any excess capacity and due to the uncertainties of future development, additional treatment capacity and treatment components would need to be developed. If this area of the proposed district is being included to entice development, then the County must have the ability to deny acceptance if the wastewater discharges present unacceptable risks. The county would also have the option of utilizing a more traditional approach of accepting treated industrial wastewater into the county's municipal treatment facility via an industrial user pretreatment permit.

4. Lack of detail from Micron

We do not know at this point what Micron will be doing to pretreat its wastewater, they have provided a list of potential technologies but have not committed to install any particular treatment train. Without knowing what they plan to use for pretreatment how can the county be confident about the quality of wastewater they are accepting?

As noted above, Micron will not reveal to the public the chemicals or quantities being delivered, used and discharged from its facility. It has provided a relatively short list of chemicals it expects in the industrial wastewater discharge along with worst case concentrations. The county should demand a complete list of chemicals, a mass balance showing the disposition of each chemical to allow the county to ground truth the anticipated wastewater quantities and characteristics. Effective treatment requires solid knowledge of what is being treated. This information should be provided and a high level of confidence established by the county before accepting responsibility for treatment of Micron's industrial wastewater.

5. Other Comments

It is reasonable for the county to accept sanitary (also referred to as municipal) wastewater from Micron and any other industries developed in the area. The presenters at the February 17, 2026 meeting all seemed to focus on issues related to Fab 1 and Fab 2 (except jobs which the numbers seemed to be for all four Fabs), but Micron has claimed they must develop 4 Fabs for the operation to be profitable so why was there no discussion on impacts from all four FABs? Both the OCWA and WEP presenters focused on Fabs 1 and 2 but there would be double the needs for all four fabs. This should be clarified.

I believe it is imperative that a robust environmental monitoring program be established to track environmental conditions in surface water, wetlands, groundwater, air, and the community impacts. This would include initiating a baseline monitoring effort to determine conditions prior to Micron beginning operations, then tracking conditions over time during operations. We have developed a framework for such a program and would appreciate the county's support for its implementation to help protect the public. We would welcome the opportunity to discuss this further with the county legislature.

Conclusion

I recommend that the county legislature not accept responsibility for treating Micron's industrial wastewater. We are taking on unnecessary risk and liability that Micron should be responsible for. However, if there have been previous legal agreements that the county cannot back out of then I have provided some initial identification of, and in some cases recommendations to help mitigate those risks and liabilities. Finally, I would welcome the opportunity to engage in a dialogue with the legislature, WEP or its engineers to discuss any details regarding my comments and concerns.


Jobs to Move America Comment: Resolution to create the Oak Orchard Industrial Sewer District

From Anna Smith [REDACTED]

Date Tue 3/3/2026 10:42 AM

To Office of the Onondaga County Legislature <onondagacountylegislature@ongov.net>

Cc [REDACTED]

 1 attachment (158 KB)

JMA_Onondaga County Leg Letter_ Oak Orchard Industrial Sewer District.pdf;

NOTICE: This email originated from outside of Onondaga County's email system. **Use caution** with links and attachments.

Dear Onondaga County Legislators;

On behalf of Jobs to Move America (JMA) we respectfully submit the following letter to share our concerns regarding Micron's proposed creation of a new Industrial Sewer District to house its industrial wastewater treatment plant. Please find our letter attached as a pdf.

We appreciate your consideration.

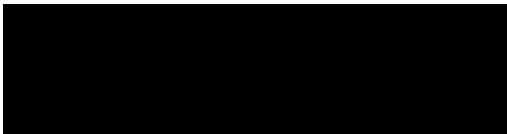
Sincerely,
Anna Smith



Anna N. Smith (she/her)

Senior Researcher

Jobs to Move America



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March 3, 2026

Onondaga County Legislature
401 Montgomery Street
Room 407 Court House
Syracuse, New York 13202

Submitted via: onondagacountylegislature@ongov.net

Re: Resolution for the creation of an Oak Orchard Industrial Sewer District

Dear Onondaga County Legislators,

On behalf of Jobs to Move America (JMA) we respectfully submit the following letter to share our concerns regarding Micron's proposed creation of a new Industrial Sewer District to house its industrial wastewater treatment plant (IWWTP). We urge the Legislature to withhold voting to approve the creation of this district until:

1. Onondaga County and Micron disclose detailed breakdown of the project cost and receive enforceable assurances that the project costs will not fall to ratepayers or otherwise be paid with public dollars.
2. Micron agrees to disclose the full list of chemicals they plan to use.
3. Micron agrees to strengthen pretreatment requirements that use treatment technologies that actually destroy PFAS, rather than simply filter PFAS.

Jobs to Move America is a strategic policy center that works to transform public spending and corporate behavior using a comprehensive approach that is rooted in racial and economic justice and community organizing. We seek to advance a fair and prosperous economy with good jobs and healthier communities for all. JMA is a member of [CNY United for Community Benefits](#) which is an alliance of Central New York workers, community leaders, educators, and environmentalists working to ensure that public subsidies given to Micron translate to real benefits for the communities in our region. We are calling on Micron to negotiate a community benefits agreement (CBA) to ensure the project provides enforceable and transparent benefits for the community and workers.

To meet the wastewater needs of the expansive Micron Campus planned in Clay, NY, Micron is proposing the creation of a new Industrial Sewer District to house its IWWTP in order to process up to 50 million gallons of industrial wastewater per day. We are not opposed to this project and believe that if done with community safety as a priority this plant and Micron's facility can substantially reduce the risks to health and well-being of the people of Central New York. However, as the plan currently stands, we have outstanding questions and concerns related

to the cost of construction and operation of the facility, transparency around the chemicals to be used, and crucially ensuring that comprehensive monitoring and treatment processes protect against pollution the Oneida River and into Lake Ontario.

Cost of the Industrial Wastewater Treatment Plant (IWWTP)

We appreciate the recent assurances that Micron will bear the cost of the treatment plant.¹ However, these assurances do not provide any enforceable guarantees to ensure Micron indeed covers the cost of the treatment plant. Notably, the County has not yet made the cost breakdown of the project public. The public deserves a detailed breakdown of the project cost. Without a clear breakdown of project costs and Micron’s payment structure to cover these costs, Micron and the County Executive’s promises are not enforceable.

We urge the Legislature to provide a detailed breakdown of the project cost including how the expansion costs may impact sewer rates for ratepayers. Without public transparency about the cost breakdown of the project and how Micron will repay the county including the exact repayment schedules, it is not clear how ratepayers will be impacted.

Monitoring, Treatment, and Transparency on Use of Chemicals

We are particularly concerned about the monitoring, treatment, and prevention of PFAS chemical discharges. According to the Environmental Protection Agency (EPA), PFAS are “an urgent public health and environmental issue facing communities across the United States.”²

Known as “forever chemicals,” PFAS are highly persistent and mobile in the environment, easily traveling through streams, rivers, and other water bodies, including drinking water sources.³ Because they break down very slowly, PFAS can easily bioaccumulate in human beings, wildlife, and the environment over time.⁴ PFAS are highly toxic and linked to serious health problems, including damage to liver, thyroid, and pancreatic function; increased risk of high blood pressure

¹ Glenn Coin, 2025. “McMahon: Micron will pay entire cost of billion-dollar industrial treatment plant.” *Syracuse.com*. February 22.

<https://www.syracuse.com/micron/2026/02/mcmahon-micron-will-pay-entire-cost-of-billion-dollar-industrial-treatment-plant.html>.

² EPA. 2021. “PFAS Strategic Roadmap: EPA’s Commitments to Action 2021–2024.” October, https://www.epa.gov/system/files/documents/2021-10/pfas-roadmap_final-508.pdf.

³ Ian T. Cousins et al. [://pubs.rsc.org/en/content/articlelanding/2019/em/c8em00515j](https://pubs.rsc.org/en/content/articlelanding/2019/em/c8em00515j).

⁴ EPA. *Our Current Understanding of the Human Health and Environmental Risks of PFAS*, <https://www.epa.gov/pfas/our-current-understanding-human-health-and-environmental-risks>.

or pre-eclampsia in pregnant women; developmental delays; immune system harm; hormone disruption; increased cholesterol levels; and increased risk of kidney or testicular cancer.^{5,6}

The semiconductor industry is known to use and discharge a broad range of harmful chemicals, including per- and polyfluoroalkyl substances (PFAS). Given the serious risks these chemicals pose to human health and the environment, it is imperative that The County hold Micron to the highest standard for monitoring and treating PFAS and other hazardous chemicals in their industrial discharge treatment.

Micron’s Chemical disclosures are incomplete

Micron’s chemical disclosures omit most of the hundreds of PFAS types used in semiconductor manufacturing on the basis that such information is confidential business information suggesting that there are potential PFAS compounds specific to the Micron facility.⁷ PFAS in wastewater, even after treatment, can bioaccumulate and persist in Lake Ontario, potentially impacting drinking water. Current regulatory requirements are not protective of the environment because they do not address the hundreds of persistent and toxic PFAS found in the semiconductor industry’s wastewater.

As currently drafted, the pollution limits and monitoring requirements for PFAS are inadequate to protect water quality, the environment, and the health of workers as well as surrounding communities. These inadequate requirements do not need to be the standard. In Oregon, Intel, a semiconductor company that operates two manufacturing facilities in the state, is required to regularly monitor and report to the state their water monitoring per the state’s water quality permit requirements.⁸ Micron can and should be held to similar standards to ensure the community is protected from water contamination and that their reporting is made public.

We urge the Onondaga County Legislature to ensure transparency about project costs and to strengthen chemical monitoring, treatment, and minimization requirements in the Oak Orchard

⁵ Ibid.

⁶ CDC. *How PFAS Impacts Your Health*.

https://www.atsdr.cdc.gov/pfas/about/health-effects.html?CDC_AAref_Val=https://www.atsdr.cdc.gov/pfas/health-effects/index.html.

⁷ OCIDA, 2025. New York State Environmental Quality Review Act: Findings Statement Findings Statement. Appendix A-5, Solid Waste and Hazardous Materials Comment 8.

⁸ Clean Water Services. 2025. 2025 Annual Report: National Pollution Discharge Elimination System Watershed-Based Waste Discharge Permit. March.

<https://cleanwaterservices.org/wp-content/uploads/2025/04/2024-NPDES-Annual-Report-ADA.pdf> ; Oregon Department of Environmental Quality. “Water Quality Permits.” <https://www.oregon.gov/deq/wq/wqpermits/pages/npdes-e-reporting.aspx>.

Wastewater Treatment Plant. In particular, Onondaga County should require Micron to be transparent with The County and the public about the chemicals and chemical combinations used in their chip manufacturing process that will ultimately be treated at the IWWTP. Micron's claims that such information is proprietary business information is an unacceptable excuse. This information will empower The County, workers, and communities to understand how to protect their health and safety before any long-term exposure to toxic chemicals occurs.

Strengthen Pretreatment Requirements for PFAS

The proposed treatment methods (reverse osmosis, nanofiltration, activated carbon, ion exchange) filter but do not destroy PFAS. Testing methods only detect ~40 PFAS types, while hundreds may be present. Non-target PFAS may exceed known ones in concentration. Micron should be required to use treatment technologies that actually destroy PFAS, rather than simply filter PFAS. As part of the industrial pretreatment program implementation requirements NYSDEC and OCDWEP should develop a PFAS Minimization and Management Plan with each Significant Industrial User (SIU), including Micron. These plans should be prepared prior to beginning operations and updated annually. The goal of any program of removal, treatment, or destruction for PFAS should be ZERO releases, as much as practical. That is, technologies, not numerical standards—which do not exist—should be the basis of the approach to eliminating PFAS in chipmaking wastewater.

Environmental compliance

With the creation of an industrial wastewater district, the county will be operating the IWWTP. Complying with the State Pollution Discharge Elimination System (SPDES) discharge permit will be the responsibility of Onondaga County's Department of Water Environment Protection (OCDWEP). Under the proposed plan, The County will assume all responsibility for making sure the water discharged to the Oneida River from the IWWTP meets all limits set by the New York State Department of Conservation (NYSDEC). Furthermore, it will be the responsibility of Onondaga County to properly handle and dispose of the solid waste sludge(s) produced at the IWWTP. Based on a review of the treatment processes to be used at the IWWTP, we can expect that up to 99% of the PFAS entering the plant will be concentrated in those sludges. As the plan currently stands, it is unclear where all this material will be sent, placing all liability from disposing of these PFAS contaminated materials on The County.

We urge the Onondaga County Legislature to withhold voting to approve the creation of the industrial wastewater district until Onondaga County and Micron disclose a detailed breakdown of the project cost and provide enforceable assurances that the project costs will not fall to

ratepayers. Additionally, we urge The Legislature to not approve the project until Micron agrees to disclose the full list of chemicals they plan to use and provide a comprehensive overview of how these chemicals will be treated to the highest standard possible.

We thank you for your efforts to protect the community and hold Micron to the strongest standards and look forward to working with you on these important issues. We hope that the County Legislature will be supportive of our efforts to negotiate a CBA with Micron to ensure enforceable benefits from Micron for the community and workers.

Sincerely,

Jobs to Move America

Public Comment = 'Oak Orchard Industrial Sewer District'

From Peter King 

Date Tue 3/3/2026 11:45 AM

To Office of the Onondaga County Legislature <legislature@ongov.net>; Nodesia Hernandez <NodesiaHernandez@ongov.net>

NOTICE: This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

Hello Onondaga County legislature,

I will make my comment short.

* Yes, **the legislature feels pressure to approve this (paper) district map**, so that the County has some assurance Micron will fully pay for their wastewater treatment.

* Especially, the Dems may feel pressure not to waste their new majority by appearing like stalling Micron.

* However, we should understand **this decision cannot be easily retracted, and further will bear impacts on generational scales.**

* Please consider the idiom, '**measure twice, cut once**'.

* **Even if the system is designed with state-of-the-art equipment**, for removing all contamination whatsoever...

* **The 2+ miles of pipelines can break with basic soil heaving.** We have all recently seen what can happen in local soils with the OCWA pipeline break, this Dec. 2025.

* Example = The Dec. OCWA break was triggered by shifting soils influenced by temperature and moisture extremes, from this winter's extreme weather conditions here (See Stuckey in Syracuse.com, Dec. 22, 2025).

* **In northern CNY, we have poorly-drained soils like clay, silt and sand which are more likely to shift from extreme weather conditions.**

* **These conditions are generally expected to increase, given climate change** (Ahmed, et al, 2024).

* Furthermore, **as Micron clears away wetlands on their campus, and along the 'Conveyance Corridor'** intended to move their wastewater to Oak Orchard, this **may mean a decreasing capacity for the local ground to absorb excess heat and moisture.** This will impart increasing stresses on the multiple pipes Micron plans for their 'Conveyance Corridor'.

* **The design choices need some more careful review, as these pipes will carry extremely toxic materials, which do not easily degrade in the natural biota.**

* **As currently proposed, the combined risks seem to lay the county open to liability on this project.**

* **Please delay making this decision, for adequate diligence.**

References

Stuckey, Greta (Dec. 22, 2025) 'Water authority urges people to use less water in 6 Central NY towns after major break' IN Syracuse.com. Updated: Dec. 22, 2025, Published: Dec. 20, 2025.

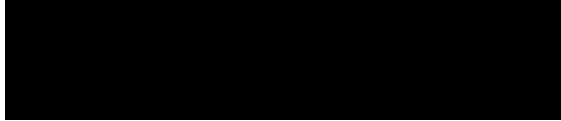
<https://www.syracuse.com/news/2025/12/water-authority-urges-people-to-use-less-water-in-6-central-ny-towns-after-major-break.html>

"The break is at the intersection of Taft Road and Northern Boulevard in the town of Cicero, according to Jeffrey Brown, executive director of OCWA.

The break was caused by shifting soil exacerbated by excessive ground water, Brown said."


Ahmed, T., Mahmood, Y., Yodo, N., & Huang, Y. (2024). Weather-related combined effect on failure propagation and maintenance procedures towards sustainable gas pipeline infrastructure. Sustainability, 16(13), 5789. <https://www.mdpi.com/2071-1050/16/13/5789>

~ Peter King,



Legislative Session Mar 3, 2026: IWW District and Housing Advisory Committee

From [REDACTED]
Date Tue 3/3/2026 10:31 AM
To Office of the Onondaga County Legislature <legislature@ongov.net>
Cc Nodesia Hernandez <Nodesiahernandez@ongov.net>; Nicole Watts <[REDACTED]>; Gregg Erikson <[REDACTED]>; Elaine Denton <[REDACTED]>

 1 attachment (37 KB)
Legislative session comments March 3 2026 by jprzepiora.pdf;

NOTICE: This email originated from **outside** of Onondaga County's email system. **Use caution** with links and attachments.

I'm submitting the attached for the record but plan to attend today's meeting and present these comments in person. Please contact me if you have any questions.

John

John Przepiora, PE, retired/unregistered
President & Director
GreeningUSA, Inc.

[REDACTED]
GreeningUSA.org & SustainCNY.org



**...Advocating for sustainable communities
to the benefit of local economies and environments.**



SustainCNY. . .Working together for a sustainable CNY!

Comments at Legislative session of Marc 3, 2026

My name is John Przepiora and I am a resident of Syracuse.

I commend Chair Watts and committee chair Denton for their proposed creation of a Housing and Transportation Stakeholder advisory committee and urge the legislature to approve the proposal. Citizen engagement is an important construct for a sustainable community as is promoted by GreeningUSA, the CNY NFP and our “12 Traits of a Sustainable Community” policy guidelines.

I also commend Chair Watts and committee chair Erikson for their leadership in creating the opportunity over this last month for the public to weigh in on the pros and cons of the proposed IWW district.

While there are still many unanswered questions about the proposed IWW treatment needed for Micron’s chipfabs, creating a mechanism for Micron to pay for the costs is perhaps commendable. Never-the-less there remain questions and issues to resolve. Since I have already submitted comments via email, I will keep my comments brief today.

My personal opinion is that approval of today’s IWW District resolution should be held until much more is known about what exactly Micron will be asked to pay for, how will the payments be made and on what schedule, but more importantly what treatment goals and the County will adopt in the interest of protecting the environment and the health and safety of residents, now and for future generations. And what risks will Onondaga County be assuming.

Since there apparently will be additional steps needing to be approved by the legislature, the passing of today's resolution may simply be an administrative step as Deputy Johnson has asserted. If this is true, then a high level of public scrutiny, transparency, and discussion must follow in order to protect residents, avoid financial and environmental risks and endeavor to avoid the pitfalls and lack of transparency which the sludge dryer project has been saddled with. So far there is a vast lack of transparency from the administration about all things Micron.

The proposed resolution should be amended to require, or held in order to obtain, at a minimum, a 'meta-plan' or 'framework' which describes steps, proposed timeline for the creation of the district, the goals and timeline for the ensuing IWW project development, the financial as well as risk management objectives of Onondaga County, and a public engagement and transparency plan.

Thank you for the opportunity to speak today. I'd be happy to answer any questions you may have now or in the future.