Full Environmental Assessment Form
Part 1 - Project and Setting

Instructions for Completing Part 1

Part 1 is to be completed by the applicant or project sponsor. Responses become part of the application for approval or funding, are subject to public review, and may be subject to further verification.

Complete Part 1 based on information currently available. If additional research or investigation would be needed to fully respond to any item, please answer as thoroughly as possible based on current information; indicate whether missing information does not exist, or is not reasonably available to the sponsor; and, when possible, generally describe work or studies that would be necessary to update or fully develop that information.

Applicants/sponsors must complete all items in Sections A & B. In Sections C, D & E, most items contain an initial question that must be answered either "Yes" or "No." If the answer to the initial question is "Yes," complete the following sub-questions. If the answer to the initial question is "No," proceed to the next question. Section F allows the project sponsor to identify and attach additional information. Section G requires the name and signature of the applicant or project sponsor to verify the information in Part 1 is accurate and complete.

A. Project and Applicant/Sponsor Information.

Name of Action or Project: Kilbourne Graphite Project		
Project Location (describe and attach a general location map): 408 Sylvia Lake Rd Gouverneur New York		
Brief Description of Proposed Action (include purpose or need): The purpose of the Kilbourne Graphite Project is to develop and operate an open-pit natural flake graphite mine and directly associated mine-site infrastructure to extract and process the Kilbourne graphite resource in St. Lawrence County, New York. The Project includes the new open pit, mine-site ore processing facilities, and the directly associated infrastructure necessary for extraction, material management, water management, site access, utilities, environmental controls, and reclamation of the graphite resource. The need for the Project arises from the lack of a secure and established domestic supply of natural flake graphite. Graphite is designated as a critical mineral by the United States Geological Survey, is designated as essential to national defense under the Defense Production Act, and is an essential input for lithium-ion battery anodes used in		
Name of Applicant/Sponsor: Joel Rheault; Empire State Mines, LLC	Telephone: 315-535-3200 E-Mail: jrheault@titanminingcorp.com	
Address: 408 Sylvia Lake Rd		
City/PO: Gouverneur	State: NY	Zip Code: 13642
Project Contact (if not same as sponsor; give name and title/role): Shelia Hess- CC Environment & Planning/ North Country Ecologica	Telephone: 585-219-4030 E-Mail: shess@ccenvironment.com	
Address: 23 Jackson Street		
City/PO: Batavia	State: NY	Zip Code: 14020
Property Owner (if not same as sponsor): St Lawrence Zinc Co., LLC	Telephone: E-Mail:	
Address: 408 Sylvia Lake Rd		
City/PO: Gouverneur	State: NY	Zip Code: 13642

B. Government Approvals

B. Government Approvals, Funding, or Sponsorship. ("Funding" includes grants, loans, tax relief, and any other forms of financial assistance.)

Government Entity	If Yes: Identify Agency and Approval(s) Required	Application Date (Actual or projected)
a. City Council, Town Board, or Village Board of Trustees ☑Yes ☐No	Town of Fowler, Building Permit	Fall 2026
b. City, Town or Village Planning Board or Commission ☑Yes ☐No	Town of Fowler, Building Permit Review	Fall 2026
c. City, Town or Village Zoning Board of Appeals ☐Yes ☑No		
d. Other local agencies ☑Yes ☐No	Oneida & Onondaga Nation, St. Regis Mohawk Tribe	Related to SHPO, Section 106
e. County agencies ☑Yes ☐No	St. Lawrence County IDA, Funding	In Progress
f. Regional agencies ☐Yes ☑No		
g. State agencies ☑Yes ☐No	NYSDEC, SHPO	July 2026
h. Federal agencies ☑Yes ☐No	USACE, USFWS	June 2026

i. Coastal Resources.
i. Is the project site within a Coastal Area or the waterfront area of a Designated Inland Waterway? ☐ Yes ☑ No

ii. Is the project site located in a community with an approved Local Waterfront Revitalization Program? ☐ Yes ☑ No

iii. Is the project site within a Coastal Erosion Hazard Area? ☐ Yes ☑ No

C. Planning and Zoning

C.1. Planning and zoning actions.

Will administrative or legislative adoption, or amendment of a plan, local law, ordinance, rule, or regulation be the only approval(s) that must be granted to enable the proposed action to proceed? ☐ Yes ☑ No

- **If Yes,** complete sections C, F and G.
- **If No,** proceed to question C.2 and complete all remaining sections and questions in Part 1

C.2. Adopted land use plans.

a. Do any municipally adopted (city, town, village, or county) comprehensive land use plan(s) include the site where the proposed action would be located? ☐ Yes ☑ No

If Yes, does the comprehensive plan include specific recommendations for the site where the proposed action would be located? ☐ Yes ☐ No

b. Is the site of the proposed action within any local or regional special planning district (for example: Greenway; Brownfield Opportunity Area (BOA); designated State or Federal heritage area; watershed management plan; or other)? ☐ Yes ☑ No

If Yes, identify the plan(s):

c. Is the proposed action located wholly or partially within an area listed in an adopted municipal open space plan or an adopted municipal farmland protection plan? ☐ Yes ☑ No

If Yes, identify the plan(s):

Located within an Agricultural District but no known protection plans. The Project area is historically associated with mining and mineral extraction activities within the Balmat mining district, and existing mining operations at Empire State Mines predate many modern land use planning initiatives.

d. Is the proposed action in a municipality with an adopted comprehensive or individual plan that addresses climate change? ☐ Yes ☑ No

If Yes , identify the elements of the plan that are relevant to the action:

C.3. Zoning

a. Is the site of the proposed action located in a municipality with an adopted zoning law or ordinance? ☐ Yes ☑ No
If Yes, what is the zoning classification(s) including any applicable overlay district?

There are no zoning laws in the Town of Fowler. The Planning Board makes its decisions and submits them to the Town Board according to the Town's Land Use Law. [https://www.fowlerny.gov/fowler-planning-board]

b. Is the use permitted or allowed by a special or conditional use permit? ☐ Yes ☐ No

c. Is a zoning change requested as part of the proposed action? ☐ Yes ☐ No
If Yes, what is the proposed new zoning for the site?

C.4. Existing community services.

a. In what school district is the project site located? Gouverneur

b. What police or other public protection forces serve the project site?
St. Lawrence County Sheriff's Office. New York State Police (NYSP) – Gouverneur Station

c. Which fire protection and emergency medical services serve the project site?
Gouverneur Fire Department, Edwards Volunteer Fire Department,Town of Fowler Volunteer Fire Department, G

d. What parks serve the project site?
Adirondack Park Regional Recreation Resources, Gouverneur Village Parks and Recreation Facilities, Sylvia La

D. Project Details

D.1. Proposed and Potential Development

a. What is the general nature of the proposed action (e.g., residential, industrial, commercial, recreational; if mixed, include all components)? Industrial-commercial-scale graphite processing facility within existing Zinc mining operations.

b. a. Total acreage of the site of the proposed action? 2537 acres
b. Total acreage to be physically disturbed? 1261 acres
c. Total acreage (project site and any contiguous properties) owned or controlled by the applicant or project sponsor? 1763 acres

c. Is the proposed action an expansion of an existing project or use? ☑ Yes ☐ No
If Yes, what is the approximate percentage of the proposed expansion and identify the units (e.g., acres, miles, housing units, square feet)? % 43.9 Units: 774 acres

d. Is the proposed action a subdivision, or does it include a subdivision? ☐ Yes ☑ No
If Yes,
i. Purpose or type of subdivision? (e.g., residential, industrial, commercial; if mixed, specify types)

ii. Is a cluster/conservation layout proposed? ☐ Yes ☐ No
iii. Number of lots proposed? _____
iv. Minimum and maximum proposed lot sizes? Minimum_____Maximum _____

e. Will the proposed action be constructed in multiple phases? ☑ Yes ☐ No

i. If No, anticipated period of construction: _____ months

ii. If Yes:

- Total number of phases anticipated 3
- Anticipated commencement date of phase 1 (including demolition) _____ month 27/28 year
- Anticipated completion date of final phase _____ month 2048 year
- Generally describe connections or relationships among phases, including any contingencies where progress of one phase may determine timing or duration of future phases: _____

Phase 1 (Year -1; Site Prep & Early Infrastructure) --> Phase 2 (Year 1-8; Open Pit Development & Conventional Tailings Mgmt) --> Phase 3 (Year 8-20; Filtered Dry-Stack Tailings Mgmt) --> Reclamation & Closure.

f. Does the project include new residential uses? ☐ Yes ☑ No

If Yes, show numbers of units proposed.

	One Family	Two Family	Three Family	Multiple Family (four or more)
Initial Phase				
At completion of all phases				

g. Does the proposed action include new non-residential construction (including expansions)? ☑ Yes ☐ No

If Yes,

i. Total number of structures 10-20

ii. Dimensions (in feet) of largest proposed structure: TBD height; 610 ft width; and 200 ft length

iii. Approximate extent of building space to be heated or cooled: 150,000 square feet

h. Does the proposed action include construction or other activities that will result in the impoundment of any liquids, such as creation of a water supply, reservoir, pond, lake, waste lagoon or other storage? ☑ Yes ☐ No

If Yes,

i. Purpose of the impoundment: Tailings (>6 ft height); containment dike (height TBD); retention basins (<6 ft height

ii. If a water impoundment, the principal source of the water: ■ Ground water ☐ Surface water streams ■ Other specify: Mill feed moisture, Arnold Lake pumps, mine dewatering, run-off and drain water.

iii. If other than water, identify the type of impounded/contained liquids and their source.

Tailings from Concentrator Plant

iv. Approximate size of the proposed impoundment. Volume: Varies/TBD million gallons; surface area: Varies/TBD acres

v. Dimensions of the proposed dam or impounding structure: Varies height; Varies length

vi. Construction method/materials for the proposed dam or impounding structure (e.g., earth fill, rock, wood, concrete):

Exact construction method / materials TBD. Primary material will be earth fill. Liners could be required (ongoing g

D.2. Project Operations

a. Does the proposed action include any excavation, mining, or dredging, during construction, operations, or both? (Not including general site preparation, grading or installation of utilities or foundations where all excavated materials will remain onsite) ☑ Yes ☐ No

If Yes:

i .What is the purpose of the excavation or dredging? Mineral extraction

ii. How much material (including rock, earth, sediments, etc.) is proposed to be removed from the site?

- Volume (specify tons or cubic yards): 30,000 kton of ore; waste stays onsite
- Over what duration of time? 20 years

iii. Describe nature and characteristics of materials to be excavated or dredged, and plans to use, manage or dispose of them.

Overburden excavated and stockpiled on site. Existing zinc tailings relocated to Arnold Pit. Graphite

iv. Will there be onsite dewatering or processing of excavated materials? ☑ Yes ☐ No

If yes, describe. Primary & secondary crushing --> Grinding & rougher flotation --> Regrind & cleaner flotation

v. What is the total area to be dredged or excavated? 200-400 acres

vi. What is the maximum area to be worked at any one time? TBD acres

vii. What would be the maximum depth of excavation or dredging? 540 feet

viii. Will the excavation require blasting? ☑ Yes ☐ No

ix. Summarize site reclamation goals and plan: _____

Reclamation activities are expected to include backfilling of some excavated areas with overburden and waste rock, followed by grading to achieve stable slopes and proper drainage. Stripped topsoil will be redistributed to support revegetation. The site will be restored to an environmentally sound condition consistent with post-mining

b. Would the proposed action cause or result in alteration of, increase or decrease in size of, or encroachment into any existing wetland, waterbody, shoreline, beach or adjacent area? ☑ Yes ☐ No

If Yes:

i. Identify the wetland or waterbody which would be affected (by name, water index number, wetland map number or geographic description): See the DEC-jurisdictional wetland map provided on 11.3.2026 and Kilbourne Aquatic Resource Delineation report. Thirteen (13) wetlands and one (1) stream are within the project area.

ii. Describe how the proposed action would affect that waterbody or wetland, e.g., excavation, fill, placement of structures, or alteration of channels, banks, and shorelines. Indicate extent of activities, alterations and additions in square feet or acres:

Discharges of dredged and/or fill material are proposed only where necessary to construct, operate, maintain, and reclaim the Kilbourne Graphite Mine Project and associated mine-site infrastructure within the current Limit

iii. Will the proposed action cause or result in disturbance to bottom sediments? ☑ Yes ☐ No

If Yes, describe: Open pit will be excavated in streams. Fill of waste rock and tailings storage in wetlands.

iv. Will the proposed action cause or result in the destruction or removal of aquatic vegetation? ☑ Yes ☐ No

If Yes:

- acres of aquatic vegetation proposed to be removed: 150
- expected acreage of aquatic vegetation remaining after project completion: 246.4 within entire project area
- purpose of proposed removal (e.g. beach clearing, invasive species control, boat access): To construct, operate, maintain, and reclaim the Kilbourne Graphite Mine Project and associated mine-si
- proposed method of plant removal: Excavation and fill
- if chemical/herbicide treatment will be used, specify product(s): None

v. Describe any proposed reclamation/mitigation following disturbance:

Reclamation is expected to include grading and stabilization of disturbed areas, erosion and sediment control mea

c. Will the proposed action use, or create a new demand for water? ☐ Yes ☑ No

If Yes:

i. Total anticipated water usage/demand per day: 125k(recycled); 50k(semi-pot gallons/day

ii. Will the proposed action obtain water from an existing public water supply? ☐ Yes ☑ No

If Yes:

- Name of district or service area: The project will not require water from an existing public water supply.
- Does the existing public water supply have capacity to serve the proposal? ☐ Yes ☑ No
- Is the project site in the existing district? ☐ Yes ☑ No
- Is expansion of the district needed? ☐ Yes ☑ No
- Do existing lines serve the project site? ☐ Yes ☑ No

iii. Will line extension within an existing district be necessary to supply the project? ☐ Yes ☑ No

If Yes:

- Describe extensions or capacity expansions proposed to serve this project:

Extensions / expansion will not be required to serve the project.

- Source(s) of supply for the district: N/A

iv. Is a new water supply district or service area proposed to be formed to serve the project site? ☐ Yes ☑ No

If, Yes:

- Applicant/sponsor for new district: No new district is proposed to serve the project site.
- Date application submitted or anticipated: N/A
- Proposed source(s) of supply for new district: N/A

v. If a public water supply will not be used, describe plans to provide water supply for the project:

Within the project, surplus water from pit / quarry dewatering and run-off / drain water will be used to support proce

vi. If water supply will be from wells (public or private), what is the maximum pumping capacity: N/A gallons/minute.

d. Will the proposed action generate liquid wastes? ☑ Yes ☐ No

If Yes:

i. Total anticipated liquid waste generation per day: TBD gallons/day

ii. Nature of liquid wastes to be generated (e.g., sanitary wastewater, industrial; if combination, describe all components and approximate volumes or proportions of each): Sewage and domestic / gray water will be collected in a buried sewage tank, pumped, and disposed of off-site by lo

iii. Will the proposed action use any existing public wastewater treatment facilities? ☐ Yes ☑ No

If Yes:

- Name of wastewater treatment plant to be used:
- Name of district:
- Does the existing wastewater treatment plant have capacity to serve the project? ☐ Yes ☐ No
- Is the project site in the existing district? ☐ Yes ☐ No
- Is expansion of the district needed? ☐ Yes ☐ No
- Do existing sewer lines serve the project site? ☐ Yes ☐ No
- Will a line extension within an existing district be necessary to serve the project? ☐ Yes ☐ No

If Yes:

- Describe extensions or capacity expansions proposed to serve this project:

iv. Will a new wastewater (sewage) treatment district be formed to serve the project site? ☐ Yes ☑ No

If Yes:

- Applicant/sponsor for new district:
- Date application submitted or anticipated:
- What is the receiving water for the wastewater discharge?

v. If public facilities will not be used, describe plans to provide wastewater treatment for the project, including specifying proposed receiving water (name and classification if surface discharge or describe subsurface disposal plans):

Sewage and domestic / gray water will be collected in a buried sewage tank, pumped, and disposed of off-site by local service provider. Industrial wastewater will be treated on-site before being discharged through SPDES

vi. Describe any plans or designs to capture, recycle or reuse liquid waste:

Contact water and industrial wastewater to be routed through a sequence of clarification and treatment ponds before reuse (or discharge). Proposed concentrate process is organized around a closed-loop system designed

e. Will the proposed action disturb more than one acre and create stormwater runoff, either from new point sources (i.e. ditches, pipes, swales, curbs, gutters or other concentrated flows of stormwater) or non-point source (i.e., sheet flow) during construction or post construction? ☑ Yes ☐ No

If Yes:

i. How much impervious surface will the project create in relation to total size of project parcel?

150k Square feet or _____ acres (impervious surface)

_____ Square feet or 1261 acres (parcel size)

ii. Describe types of new point sources. Ditches around site infrastructure such as open pit mine, waste material management areas, and plant site

iii. Where will the stormwater runoff be directed (i.e. on-site stormwater management facility/structures, adjacent properties, groundwater, on-site surface water, or off-site surface waters)?

Stormwater will be directed to on-site stormwater management ponds for settling, treatment as required, and disch

- If to surface waters, identify receiving water bodies or wetlands:

SPDES outfall at Turnpike Creek or one of its tributaries.

- Will stormwater runoff flow to adjacent properties? ☑ Yes ☐ No

iv. Does the proposed plan minimize impervious surfaces, use pervious materials or collect and re-use stormwater? ☑ Yes ☐ No

f. Does the proposed action include, or will it use on-site, one or more sources of air emissions, including fuel combustion, waste incineration, or other processes or operations? ☑ Yes ☐ No

If Yes, identify:

i. Mobile sources during project operations (e.g., heavy equipment, fleet or delivery vehicles)

Heavy equipment, fleet or delivery vehicles, drill & blast operations.

ii. Stationary sources during construction (e.g., power generation, structural heating, batch plant, crushers)

TBD

iii. Stationary sources during operations (e.g., process emissions, boilers, electric generation, surface coating)

Concentrator Plant Equipment (crushing, grinding, drying, bagging), emergency power generation.

g. Will any air emission sources named in D.2.f (above), require an Air Facility Registration, Air State Facility Permit, Title IV Permit or Title V Permit? ☑ Yes ☐ No

If Yes:

i. Is the proposed action subject to the Nonattainment New Source Review or Prevention of Significant Deterioration requirements discussed in 6 NYCRR Part 231? ☐ Yes ☑ No

ii. As calculated in the air permit application, the proposed action has the potential to emit:

- TBD Tons/year (short tons) of carbon monoxide (CO)
- TBD Tons/year (short tons) of oxides of nitrogen (NOx)
- TBD Tons/year (short tons) of particulate matter (PM-10, PM-2.5)
- TBD Tons/year (short tons) of volatile organic compounds (VOC)
- TBD Tons/year (short tons) of sulfur dioxide (SO_2)

iii. Will emissions of air contaminants from the proposed action described above exceed the corresponding major source thresholds? ☐ Yes ☐ No

iv. Does the proposed action have the potential to emit 10 tons/year or more of any one designated hazardous air pollutant or 25 tons/year or more of any combination of such hazardous air pollutants (6NYCRR 200.1(ag))? ☑ Yes ☐ No

If Yes, provide the total potential to emit hazardous air pollutants in short tons/year: TBD - See Attch F-1

h. Will the proposed action generate or emit annual direct and indirect greenhouse gas emissions, such as carbon dioxide, methane, nitrous oxide, sulfur hexafluoride, hydrofluorocarbons, or perfluorocarbons in excess of 10,000 metric tons of total carbon dioxide equivalents per year at any point in the lifetime of the proposed action (estimated using the carbon dioxide equivalent definition and global warming potentials provided in 6 NYCRR Part 496)? ☐ Yes ☐ No

If Yes:

i. Estimate the proposed action's metric tons of carbon dioxide equivalents in tons/year (metric): >7,250 tons/yr (short tons)

ii. Describe any greenhouse gas capture, control, or elimination measures included in project design:

See Attch F-1

i. Will the proposed action result in the release of air pollutants from open-air operations or processes, such as quarry or landfill operations? ☑ Yes ☐ No

If Yes: Describe operations and nature of emissions (e.g., diesel exhaust, rock particulates/dust):

Diesel exhaust, rock particulates / dust. All dust resulting from excavating, processing, or use of heavy equipment will be controlled using water, suitable mechanical or approved chemical methods.

j. Will the proposed action result in a substantial increase in traffic above present levels or generate substantial new demand for transportation facilities or services? ☐ Yes ☑ No

If Yes:

i. When is the peak traffic expected (Check all that apply): ☐ Morning ☐ Evening ☐ Weekend

☑ Randomly between hours of 7 AM to 7 PM.

ii. For commercial activities only, projected number of truck trips/day and type (e.g., semi trailers and dump trucks):

Max 20 truck loadouts per day. Time TBD. Standard 53 ft trailers.

iii. Parking spaces: Existing Proposed TBD Net increase/decrease TBD

iv. Does the proposed action include any shared use parking? ☐ Yes ☑ No

v. If the proposed action includes any modification of existing roads, creation of new roads or change in existing access, describe:

New / modified intersections will be developed North of Silvia Lake Road. Please see included preliminary loadout

vi. Are public/private transportation service(s) or facilities available within ½ mile of the proposed site? ☐ Yes ☑ No

vii Will the proposed action include access to public transportation or accommodations for use of hybrid, electric or other alternative fueled vehicles? ☐ Yes ☑ No

viii. Will the proposed action include plans for pedestrian or bicycle accommodations for connections to existing pedestrian or bicycle routes? ☐ Yes ☑ No

k. Will the proposed action (for commercial or industrial projects only) generate new or additional energy demand? ☑Yes ☐No

If Yes:

i. Estimate annual electricity demand during operation of the proposed action: 12 - 15 MVA (to be confirmed / refined)

ii. Anticipated sources/suppliers of electricity for the project (e.g., on-site combustion, on-site renewable, via grid/local utility, or other): Grid connection + emergency on-site backup generation.

iii. Will the proposed action require a new, or an upgrade, to an existing substation? ☑ Yes ☐No

l. Hours of operation. Answer all items which apply.

i. During Construction:

- Monday - Friday: 6 AM - 7 PM
- Saturday: 6 AM - 7 PM
- Sunday: 6 AM - 7 PM
- Holidays: 6 AM - 7 PM

ii. During Operations:

- Monday - Friday: 6-7(Pit, Crusher), 24h (Plant
- Saturday: 6-7(Pit, Crusher), 24h (Plant)
- Sunday: 6-7(Crusher), 24h (Plant)
- Holidays: 6-7(Pit, Crusher), 24h (Plant)

m. Will the proposed action produce noise that will exceed existing ambient noise levels during construction, operation, or both? ☑Yes ☐No

If yes:

i. Provide details including sources, time of day and duration:

Noise produced consistently during operation hours. Mining construction and operations (drilling & blasting, loaders, and haul trucks). Outdoors processing (crushing, screening, and washing)

ii. Will the proposed action remove existing natural barriers that could act as a noise barrier or screen? ☑Yes ☐No

Describe: Removal of trees; however, earthen or rock berms will be constructed around the quarry and will help mitigate noise

n. Will the proposed action have outdoor lighting? ☑Yes ☐No

If yes:

i. Describe source(s), location(s), height of fixture(s), direction/aim, and proximity to nearest occupied structures:

Permanent lights at plant. Mobile / temporary lights at waste / overburden dumps, pits at intersections and shovel face, and during construction. Lights in use at low light (start and end) of shifts only. Height and aim of lights to

ii. Will proposed action remove existing natural barriers that could act as a light barrier or screen? ☑Yes ☐No

Describe: Removal of trees; however, earthen or rock berms will be constructed around the quarry and tailings and will help block light. Dark sky lighting under consideration.

o. Does the proposed action have the potential to produce odors for more than one hour per day? ☐Yes ☐No

If Yes, describe possible sources, potential frequency and duration of odor emissions, and proximity to nearest occupied structures:

TBD

p. Will the proposed action include any bulk storage of petroleum (combined capacity of over 1,100 gallons) or chemical products 185 gallons in above ground storage or any amount in underground storage? ☑Yes ☐No

If Yes:

i. Product(s) to be stored Diesel, propane, various lubricants / hydraulic oils

ii. Volume(s) >24k per unit time month (e.g., month, year)

iii. Generally, describe the proposed storage facilities:

Diesel fueling station (at least 10,600 gal).

q. Will the proposed action (commercial, industrial and recreational projects only) use pesticides (i.e., herbicides, insecticide) during construction or operation? ☑ Yes ☐No

If Yes:

i. Describe proposed treatment(s):

Roundup Custom for Aquatic & Terrestrial Use (EPA Reg # 524-343) will likely be used to treat invasive phragmites before clearing and grubbing and potentially for maintenance.

ii. Will the proposed action use Integrated Pest Management Practices? ☑Yes ☐No

r. Will the proposed action (commercial or industrial projects only) involve or require the management or disposal of solid waste (excluding hazardous materials)? ☑Yes ☐No

If Yes:

i. Describe any solid waste(s) to be generated during construction or operation of the facility:

- Construction: TBD tons per TBD (unit of time)
- Operation : >150 tons per month (unit of time)

ii. Describe any proposals for on-site minimization, recycling or reuse of materials to avoid disposal as solid waste:

- Construction: Cardboard, scrap metal, and tires will be segregated and sent to off-site recycling facilities.
- Operation: Cardboard, scrap metal, and tires will be segregated and sent to off-site recycling facilities.

iii. Proposed disposal methods/facilities for solid waste generated on-site:

- Construction: See table at bottom of page. General refuse is collected by Casella and disposed of at the
- Operation: General refuse is collected by Casella and disposed of at the Rodman NY Landfill. Cardboard is collected by Casella. Metal is collected by Kimco Steel. Tires are collected by Mclaughlin

s. Does the proposed action include construction or modification of a solid waste management facility? ☐Yes ☑ No

If Yes:

i. Type of management or handling of waste proposed for the site (e.g., recycling or transfer station, composting, landfill, or other disposal activities): _____

ii. Anticipated rate of disposal/processing:

- _____ Tons/month, if transfer or other non-combustion/thermal treatment, or
- _____ Tons/hour, if combustion or thermal treatment

iii. If landfill, anticipated site life: _____ years

t. Will the proposed action at the site involve the commercial generation, treatment, storage, or disposal of hazardous waste? ☐Yes ☑No

If Yes:

i. Name(s) of all hazardous wastes or constituents to be generated, handled, or managed at facility: _____

ii. Generally describe processes or activities involving hazardous wastes or constituents:

iii. Specify amount to be handled or generated _____ tons/month

iv. Describe any proposals for on-site minimization, recycling, or reuse of hazardous constituents: _____

v. Will any hazardous wastes be disposed at an existing offsite hazardous waste facility? ☐Yes ☐No

If Yes: provide name and location of facility: _____

If No: describe proposed management of any hazardous wastes which will not be sent to a hazardous waste facility:

E. Site and Setting of Proposed Action

E.1. Land uses on and surrounding the project site

a. Existing land uses.

i. Check all uses that occur on, adjoining and near the project site.

☐Urban ☒Industrial ☒Commercial ☒Residential (suburban) ☒Rural (non-farm)
☒Forest ☒Agriculture ☒Aquatic ☐Other (specify):

ii. If mix of uses, generally describe:

Surrounding land use is combination of industrial mining operations, seasonal and year-round residential uses, agriculture, and undeveloped forestland. Residential receptors are concentrated primarily along Sylvia Lake and

b. Land uses and cover types on the project site.

Land use or Cover type	Current Acreage	Acreage After Project Completion	Change (Acres +/-)
• Roads, buildings, and other paved or impervious surfaces (total)	108	158	+50
• Industrial or manufacturing	108	158	+50
• Commercial	0	0	0
• Residential	0	0	0
• Forested	1025	625	-400
• Meadows, grasslands or brushlands (non-agricultural, including abandoned agricultural)	52	552	+500
• Agricultural (includes active orchards, field, greenhouse, etc.)	150	80	-70
• Surface water features (lakes, ponds, streams, rivers, etc.)	125	85	-40
• Wetlands (freshwater or tidal)	425	230	-195
• Non-vegetated (bare rock, earth, or fill)	654	809	+155
• Other, Describe: Estimated acres with fille			

c. Is the project site presently used by members of the community for public recreation? ☐ Yes ☒ No

i. If Yes: explain: _____

d. Are there any facilities serving children, the elderly, people with disabilities (e.g., schools, hospitals, licensed day care centers, or group homes) within 1500 feet of the project site? ☐ Yes ☒ No

If Yes,

i. Identify facilities:

e. Does the project site contain an existing dam? ☒ Yes ☐ No

If Yes:

i. Dimensions of the dam and impoundment:

- Dam height: 50 (South), 37 (North) feet
- Dam length: 1,891 (South), 1,142 (North) feet
- Surface area: 190 (South), 44 (North) acres
- Volume impounded: 5,250 (South), 710 (North) ac-ft gallons OR acre-feet

ii. Dam's existing hazard classification: North and South dams are both Class D - No Hazards

iii. Provide date and summarize results of last inspection:

Last third-party DSI Q4 2024: Minor erosion on both dams. Seepage on South dam. No signs of distress.
A third-party DSI was completed in September 2026 by Tierra Group and the report is currently being prepared.

f. Has the project site ever been used as a municipal, commercial or industrial solid waste management facility, or does the project site adjoin property that is now, or was at one time, used as a solid waste management facility? ☐ Yes ☒ No

If Yes:

i. Has the facility been formally closed? ☐ Yes ☐ No

- If Yes, cite sources/documentation: _____

ii. Describe the location of the project site relative to the boundaries of the solid waste management facility:

iii. Describe any development constraints due to the prior solid waste activities: _____

g. Have hazardous wastes been generated, treated and/or disposed of at the site, or does the project site adjoin property which is now or was at one time used to commercially treat, store and/or dispose of hazardous waste? ☐ Yes ☒ No

If Yes:

i. Describe waste(s) handled and waste management activities, including approximate time when activities occurred:

No hazardous waste has been sent off site historically.

h. Potential contamination history. Has there been a reported spill at the proposed project site, or have any remedial actions been conducted at or adjacent to the proposed site? ☒ Yes ☐ No

If Yes:

i. Is any portion of the site listed on the NYSDEC Spills Incidents database or Environmental Site Remediation database? Check all that apply: ☒ Yes ☐ No

☒ Yes – Spills Incidents database — Provide DEC ID number(s): 1703035

☒ Yes – Environmental Site Remediation database — Provide DEC ID number(s): 645010 & 645012 (#2 Historic a

☐ Neither database

ii. If site has been subject of RCRA corrective activities, describe control measures: _____

iii. Is the project within 2000 feet of any site in the NYSDEC Environmental Site Remediation database? ☐ Yes ☒ No

If Yes, provide DEC ID number(s): _____

iv. If Yes to (i), (ii) or (iii) above, describe current status of site(s):

v. Is the project site subject to an institutional control limiting property uses? ☐Yes ☒No

- If Yes, DEC site ID number: _____
- Describe the type of institutional control (e.g., deed restriction or easement): _____
- Describe any use limitations: _____
- Describe any engineering controls: _____
- Will the project affect the institutional or engineering controls in place? ☐Yes ☐No
- Explain: _____

E.2. Natural Resources On or Near Project Site

a. What is the average depth to bedrock on the project site? <50 feet

b. Are there bedrock outcroppings on the project site? ☒Yes ☐No
If Yes, what proportion of the site is comprised of bedrock outcroppings? 46% w/15% expose%

c. Predominant soil type(s) present on project site:

Summerville-Rock outcrop	18.3 %
Insula-Rock outcrop compl	14.2 %
Udorthents, mine waste, nc	10.3 %

d. What is the average depth to the water table on the project site? Average: >6 feet

e. Drainage status of project site soils:

☐Well Drained:	69 % of site
☐Moderately Well Drained:	5 % of site
☐Poorly Drained	13 % of site

f. Approximate proportion of proposed action site with slopes:

☐0-10%:	50 % of site
☐10-15%:	30 % of site
☐15% or greater:	20 % of site

g. Are there any unique geologic features on the project site? ☒Yes ☐No
If Yes, describe: Sylvia Lake Road - Fowler

h. Surface water features.

i. Does any portion of the project site contain wetlands or other waterbodies (including streams, rivers, ponds, or lakes)? ☒Yes ☐No

ii. Do any wetlands or other waterbodies adjoin the project site? ☒Yes ☐No

If Yes to either *i* or *ii*, continue. If No, skip to E.2.i.

iii. Are any of the wetlands or waterbodies within or adjoining the project site regulated by any federal, state or local agency? ☒Yes ☐No

iv. For each identified regulated wetland and waterbody on the project site, provide the following information:

- Streams: Name 910-1278, 910-1300, 910-1301, 910-1303, 91 Classification D, AA, C(T)
- Lakes or Ponds: Name 910-1305 Classification D
- Wetlands: Name Federal Waters, Federal Waters, Federal Wa Approximate Size 411.5
- Wetland No. (if regulated by DEC) GO-14, 16, 18 & 19.

v. Are any of the above water bodies listed in the most recent compilation of NYS water quality-impaired waterbodies? ☐Yes ☒No

If Yes, name of impaired water body/bodies and basis for listing as impaired: _____

i. Is the project site in a designated Floodway? ☐Yes ☒No

j. Is the project site in the 100-year Floodplain? ☒Yes ☐No

k. Is the project site in the 500-year Floodplain? ☒Yes ☐No

l. Is the project site located over, or immediately adjoining, a primary, principal or sole source aquifer? ☐Yes ☒No
If Yes:

i. Name of aquifer: _____

m. Identify the predominant wildlife species that occupy or use the project site:

Deer	Skunk	Possum
Porcupine	Black bear	Crow, raven, turkey vulture
Fox, coyote	Barn owl, blue jay, starling	Red-tailed hawk

n. Does the project site contain a designated significant natural community? ☐ Yes ☒ No

If Yes:

i. Describe the habitat/community (composition, function, and basis for designation): _____

ii. Source(s) of description or evaluation:

iii. Extent of community/habitat:

- Currently: _____ acres
- Following completion of project as proposed: _____ acres
- Gain or loss (indicate + or -): _____ acres

o. Does project site contain any species of plant or animal that is listed by the federal government or NYS as endangered or threatened, or does it contain any areas identified as habitat for an endangered or threatened species? ☒ Yes ☐ No

If Yes:

i. Species and listing (endangered or threatened): _____

Northern Long-eared Bat (Myotis septentrionalis) – Federally Endangered. Tricolored Bat (Perimyotis subflavus) – Federally Proposed Endangered. Monarch Butterfly (Danaus plexippus) – Federally Proposed

p. Does the project site contain any species of plant or animal that is listed by NYS as rare, or as a species of special concern? ☐ Yes ☒ No

If Yes:

i. Species and listing: _____

q. Is the project site or adjoining area currently used for hunting, trapping, fishing or shell fishing? ☒ Yes ☐ No

If Yes, give a brief description of how the proposed action may affect that use: _____

Big and small game and trapping in adjacent forested areas. Loss of habitat will displace game species onto

E.3. Designated Public Resources On or Near Project Site

a. Is the project site, or any portion of it, located in a designated agricultural district certified pursuant to Agriculture and Markets Law, Article 25-AA, Section 303 and 304? ☒ Yes ☐ No

If Yes, provide county plus district name/number: STLA001

b. Are agricultural lands consisting of highly productive soils present? ☒ Yes ☐ No

i. If Yes: acreage(s) on project site? 50 acres

ii. Source(s) of soil rating(s): Web Soil Survey- DpB, HaA, NoB

c. Does the project site contain all or part of, or is it substantially contiguous to, a registered National Natural Landmark? ☐ Yes ☒ No

If Yes:

i. Nature of the natural landmark: ☐ Biological Community ☐ Geological Feature

ii. Provide brief description of landmark, including values behind designation and approximate size/extent: _____

d. Is the project site located in or does it adjoin a state listed Critical Environmental Area? ☐ Yes ☒ No

If Yes:

i. CEA name: _____

ii. Basis for designation: _____

iii. Designating agency and date: _____

e. Does the project site contain, or is it substantially contiguous to, a building, archaeological site, or district listed on the National or State Register of Historic Places, or that has been determined by the Commissioner of the NYSOffice of Parks, Recreation and Historic Preservation to be eligible for listing on the State Register of Historic Places? ☒Yes ☐No

If Yes:

i. Nature of historic/archaeological resource: ☒Archaeological Site ☒Historic Building or District

ii. Name: Adjacent to project is D. Glazier Historic Site. The Jenne Farm Historic Site.

iii. Brief description of attributes on which listing is based:

Glazier Historic Site- historic farmhouse. The Jenne Farm Historic Site- cast concrete foundation.

f. Is the project site, or any portion of it, located in or adjacent to an area designated as sensitive for archaeological sites on the New York State Historic Preservation Office (SHPO) archaeological site inventory? ☒Yes ☐No

g. Have additional archaeological or historic site(s) or resources been identified on the project site? ☒Yes ☐No

If Yes:

i. Describe possible resource(s): Potential precontact sites and map-documented structures.

ii. Basis for identification: SHPO response to Phase 1A survey. Phase IB and Phase II is ongoing.

h. Is the project site within five miles of any officially designated and publicly accessible federal, state, or local scenic, or aesthetic resource? ☒Yes ☐No

If Yes:

i. Identify resource: Sylvia Lake

ii. Nature of, or basis for, designation (e.g., established highway overlook, state or local park, state historic trail, or scenic byway, etc.): Public and private recreational use including boating, fishing, swimming, shoreline recreation, and seasor

iii. Distance between project and resource: 0.1 miles.

i. Is the project site located within a designated river corridor under the Wild, Scenic and Recreational Rivers Program 6 NYCRR 666? ☐Yes ☒No

If Yes:

i. Identify the name of the river and its designation:

ii. Is the activity consistent with development restrictions contained in 6NYCRR Part 666? ☐Yes ☐No

E.4. Disadvantaged Communities Designated Pursuant to ECL Article 75

a. Is the project located within, or within ½ mile of, a disadvantaged community? ☐Yes ☒No

If No, could impacts(see examples below in E.4.b) from the project affect a disadvantaged community? ☐Yes ☒No

If Yes to either question in E.4.a, answer the remaining questions in this section.

b. Will there be direct or indirect impacts that may affect a disadvantaged community, such as those listed below? ☐Yes ☐No

i. new noise sources or expansions/modification of existing noise sources;
- noise from operational sources
- noise from construction activities

ii. emissions of air pollutants including, mobile emissions;

iii. wastewater discharges;

iv. generation of odors;

v. light pollution;

vi. new or modified radiation sources;

vii. new or modified sources of solid waste generation, management, or disposal.

If Yes, describe the impacts:

c. Do any of the State agency approvals identified in question B.g include any of the following DEC permits?

State Pollutant Discharge Elimination System (SPDES)	☐Yes	☐No
Solid Waste Management Facility	☐Yes	☐No
Hazardous Waste Management Facility	☐Yes	☐No
Air Pollution Control (Title V or Air State Facility)	☐Yes	☐No
Water Withdrawal over 20 MGD for Cooling Water	☐Yes	☐No
Waste Transporter	☐Yes	☐No

E.5 Future Physical Climate Risks

Will the proposed action be vulnerable to the following future physical climate risks under current or projected future conditions:

a. Is the proposed action vulnerable to damage from a projected 100-year flood? ☐ Yes ☒ No

b. Is the proposed action vulnerable to damage from a projected 500-year flood? ☒ Yes ☐ No

c. Is the proposed action in an area potentially affected by sea level rise? ☐ Yes ☒ No

d. Will the proposed action increase the vulnerability of human or ecological communities to the following:

i. drought? ☐ Yes ☒ No

ii. temperature extremes (hot or cold)? ☐ Yes ☒ No

iii. extreme storms, including high winds? ☐ Yes ☒ No

iv. landslides? ☐ Yes ☒ No

v. coastal erosion? ☐ Yes ☒ No

vi. stormwater flooding? ☐ Yes ☒ No

vii. other climate or weather hazards? ☐ Yes ☒ No If Yes, describe: _____

F. Additional Information

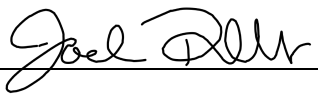
Attach any additional information which may be needed to clarify your project.

If you have identified any adverse impacts which could be associated with your proposal, please describe those impacts plus any measures which you propose to avoid or minimize them.

G. Verification

I certify that the information provided is true to the best of my knowledge.

Applicant/Sponsor Name Joel Rheault Date 11/04/2026

Signature  Title VP Operations

ATTACHMENT F-1

Full Environmental Assessment Form, Part 1 — Section F, Additional Information

Kilbourne Graphite Project

Town of Fowler, St. Lawrence County, New York

Purpose

This attachment provides supporting responses to items in the adopted Full Environmental Assessment Form (FEAF 2026) Part 1 that request information not solicited by the prior version of the form. The responses are provided consistent with the instructions to Part 1, which direct the applicant or project sponsor to complete the form based on information currently available, to indicate where information is not reasonably available to the sponsor, and to generally describe the work or studies that would be necessary to update or fully develop that information.

The Project is at a conceptual design stage. Quantities, configurations, and dimensions presented in Part 1 reflect the current preliminary configuration and remain subject to engineering refinement.

D.2.g — Air Emission Sources Requiring Permit or Registration

D.2.g.ii — Potential to Emit, Criteria Pollutants

Potential-to-emit (PTE) estimates for carbon monoxide, oxides of nitrogen, particulate matter (PM-10 and PM-2.5), volatile organic compounds, and sulfur dioxide have not been developed at the time of this submission and are not reasonably available to the Applicant. All of the listed contaminants are expected to be emitted by the proposed new emission sources.

Process design is advancing through staged engineering releases, and the information required to construct an emissions inventory — equipment schedules, throughputs and operating hours, material handling configurations, and air pollution control equipment selections — is not yet available. An air permit applicability review is underway, including development of potential-to-emit and expected actual emissions for all criteria pollutants, hazardous air pollutants, and greenhouse gases, together with evaluation of applicability under 6 NYCRR Parts 201, 212, and 231.

Quantified values will be provided to the Department as they become available and as the review progresses, and will accompany the applicable Air Facility Registration Notification of Change or Air State Facility permit application.

D.2.g.iii — Major Source Thresholds

The Applicant does not anticipate that facility-wide potential emissions will exceed the corresponding major source thresholds. This response reflects information currently available and is subject to confirmation through the air permitting process, which constitutes a separate approval.

D.2.g.iv — Hazardous Air Pollutants

The Applicant does not anticipate potential emissions of 10 tons per year or more of any single designated hazardous air pollutant, or 25 tons per year or more of any combination of such pollutants, as defined at 6 NYCRR 200.1(ag). Anticipated sources are limited to combustion of diesel fuel in mobile mining equipment and emergency standby generation, combustion of propane, and process reagent handling. The reagent suite for the graphite concentrator is limited to diesel as the flotation collector and methyl isobutyl carbinol as the frother, together with a flocculant used for tailings settling; no sulfide collectors, or depressants are required by the process design. A quantified hazardous air pollutant inventory is in preparation and the total potential to emit in short tons per year will be provided upon its completion.

D.2.h — Greenhouse Gas Emissions

D.2.h.i — Estimated Carbon Dioxide Equivalents

A facility-specific greenhouse gas inventory consistent with 6 NYCRR Part 496 has not been completed at the time of this submission. The Project is expected to generate direct and indirect greenhouse gas emissions, and the Applicant anticipates that total annual carbon dioxide equivalent emissions may exceed 10,000 metric tons in one or more years of the Project lifetime. The principal anticipated sources are indirect emissions associated with purchased electricity for the concentrator and ancillary facilities, direct emissions from diesel combustion in the mining fleet and support equipment, and emissions associated with land use change within the disturbance footprint.

A consistency evaluation under the Climate Leadership and Community Protection Act, quantifying direct, indirect, and upstream emissions using the twenty-year global warming potentials established at 6 NYCRR Part 496, is in preparation. Quantified estimates will be provided to the Department as they become available and as the review progresses, and will accompany the applicable air permitting submission.

D.2.h.ii — Greenhouse Gas Capture, Control, or Elimination Measures

Greenhouse gas reduction measures incorporated into, or under evaluation in, the Project design include the following:

- Operation of the graphite concentrator on purchased electricity rather than on-site fuel combustion, with on-site combustion generation limited to emergency standby service.
- Connection to the New York State transmission grid, the upstate portion of which is served predominantly by zero-emission generating resources.
- A closed-loop process water circuit using surplus pit dewatering and site drainage water, which reduces freshwater withdrawal, conveyance, and treatment energy demand.
- Relocation and management of existing zinc tailings and Project waste rock within the site, which avoids off-site haulage emissions.
- Concurrent reclamation and revegetation of disturbed areas as mining advances, which restores carbon stock earlier in the mine life than end-of-life reclamation alone.

- Compensatory wetland mitigation that restores wetland carbon stock and sequestration function.

Additional feasible alternatives and mitigation measures will be identified through the Climate Leadership and Community Protection Act consistency evaluation in preparation and will be provided as the review progresses.

D.2.o — Odors

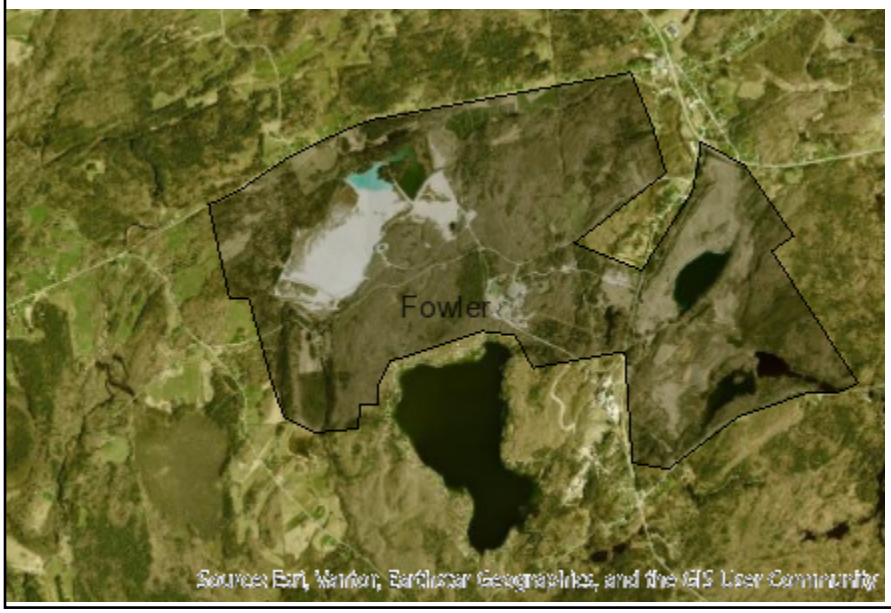
The Project is not anticipated to produce odors for more than one hour per day at or beyond the Project boundary. The graphite concentration process does not involve combustion of process materials, thermal treatment of organic material, biological treatment, or the handling of putrescible waste.

The process reagent suite is limited to diesel as the flotation collector and methyl isobutyl carbinol as the frother, together with a flocculant used for tailings settling; no sulfide collectors, or depressants are required. Reagents are received in sealed containers, stored in a dedicated reagent storage facility adjacent to the concentrator, and distributed to addition points through a closed piped system. Flotation, regrinding, concentrate dewatering, drying, screening, and bagging are conducted within the enclosed concentrator building.

Transient, intermittent odors characteristic of diesel exhaust may occur in the immediate vicinity of active mining and haulage areas, and products of detonation may be transiently detectable following blasting events, which occur on a limited schedule during daylight operating hours. Sanitary wastewater is collected in a buried holding tank and removed from the site by a licensed service provider. The nearest residential receptors are located along Sylvia Lake Road and Farm to Market Road.

EAF Mapper Summary Report

Wednesday, May 13, 2026 12:00 PM



Disclaimer: The EAF Mapper is a screening tool intended to assist project sponsors and reviewing agencies in preparing an environmental assessment form (EAF). Not all questions asked in the EAF are answered by the EAF Mapper. Additional information on any EAF question can be obtained by consulting the EAF Workbooks. Although the EAF Mapper provides the most up-to-date digital data available to DEC, you may also need to contact local or other data sources to confirm data provided by the Mapper or to obtain data not provided by the Mapper.



B.i.i [Coastal or Waterfront Area]	No
B.i.ii [Local Waterfront Revitalization Area]	No
C.2.b. [Special Planning District]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.1.h [DEC Spills or Remediation Site - Potential Contamination History]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.1.h.i [DEC Spills or Remediation Site - Listed]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.1.h.i [DEC Spills or Remediation Site - Environmental Site Remediation Database]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.1.h.iii [Within 2,000' of DEC Remediation Site]	No
E.2.g [Unique Geologic Features]	Yes
E.2.g [Unique Geologic Features]	Sylvia Lake Road - Fowler
E.2.h.i [Surface Water Features]	Yes - Digital mapping information on local, New York State, and federal wetlands and waterbodies is known to be incomplete. Refer to the EAF Workbook.
E.2.h.ii [Surface Water Features]	Yes - Digital mapping information on local, New York State, and federal wetlands and waterbodies is known to be incomplete. Refer to the EAF Workbook.
E.2.h.iii [Surface Water Features]	Yes - Digital mapping information on local, New York State, and federal wetlands and waterbodies is known to be incomplete. Refer to the EAF Workbook.
E.2.h.iv [Surface Water Features - Stream Name]	910-1278, 910-1300, 910-1301, 910-1303, 910-1304, 910-1305
E.2.h.iv [Surface Water Features - Stream Classification]	D, AA, C(T)
E.2.h.iv [Surface Water Features - Lake/Pond Name]	910-1305

E.2.h.iv [Surface Water Features - Lake/Pond Classification]	D
E.2.h.iv [Surface Water Features - Wetlands Name]	Federal Waters
E.2.h.v [Impaired Water Bodies]	No
E.2.i. [Floodway]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.2.j. [100 Year Floodplain]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.2.k. [500 Year Floodplain]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.2.l. [Aquifers]	No
E.2.n. [Natural Communities]	No
E.2.o. [Endangered or Threatened Species]	No
E.2.p. [Rare Plants or Animals]	No
E.3.a. [Agricultural District]	Yes
E.3.a. [Agricultural District]	STLA001
E.3.c. [National Natural Landmark]	No
E.3.d [Critical Environmental Area]	No
E.3.e. [National or State Register of Historic Places or State Eligible Sites]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.3.f. [Archeological Sites]	Yes
E.3.i. [Designated River Corridor]	No

Agency Use Only [If applicable]

Project : Kilbourne Graphite Project

Date : 11/10/2026

Full Environmental Assessment Form
Part 2 - Identification of Potential Project Impacts

Part 2 is to be completed by the lead agency. Part 2 is designed to help the lead agency inventory all potential resources that could be affected by a proposed project or action. We recognize that the lead agency-s reviewer(s) will not necessarily be environmental professionals. So, the questions are designed to walk a reviewer through the assessment process by providing a series of questions that can be answered using the information found in Part 1. To further assist the lead agency in completing Part 2, the form identifies the most relevant questions in Part 1 that will provide the information needed to answer the Part 2 question. When Part 2 is completed, the lead agency will have identified the relevant environmental areas that may be impacted by the proposed activity.

If the lead agency is a state agency **and** the action is in any Coastal Area, complete the Coastal Assessment Form before proceeding with this assessment.

Tips for completing Part 2:

- Review all of the information provided in Part 1.
- Review any application, maps, supporting materials and the Full EAF Workbook.
- Answer each of the 18 questions in Part 2.
- If you answer "**Yes"** to a numbered question, please complete all the questions that follow in that section.
- If you answer "**No"** to a numbered question, move on to the next numbered question.
- Check appropriate column to indicate the anticipated size of the impact.
- Proposed projects that would exceed a numeric threshold contained in a question should result in the reviewing agency checking the box "Moderate to large impact may occur."
- The reviewer is not expected to be an expert in environmental analysis.
- If you are not sure or undecided about the size of an impact, it may help to review the sub-questions for the general question and consult the workbook.
- When answering a question consider all components of the proposed activity, that is, the whole action.
- Consider the possibility for long-term and cumulative impacts as well as direct impacts.
- Answer the question in a reasonable manner considering the scale and context of the project.

1. Impact on Land

Proposed action may involve construction on, or physical alteration of, the land surface of the proposed site. (See Part 1. D.1)

☐ NO ☑ YES

If "Yes", answer questions a - j. If "No", move on to Section 2.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may involve construction on land where depth to water table is less than 3 feet.	E2d	☐	☑
b. The proposed action may involve construction on slopes of 15% or greater.	E2f	☑	☐
c. The proposed action may involve construction on land where bedrock is exposed, or generally within 5 feet of existing ground surface.	E2a	☑	☐
d. The proposed action may involve the excavation and removal of more than 1,000 tons of natural material.	D2a	☐	☑
e. The proposed action may involve construction that continues for more than one year or in multiple phases.	D1e	☐	☑
f. The proposed action may result in increased erosion, whether from physical disturbance or vegetation removal (including from treatment by herbicides).	D2e, D2q	☐	☑
g. The proposed action is, or may be, located within a Coastal Erosion hazard area.	B1i	☑	☐
h. Other impacts:		☐	☐

2. Impact on Geological Features

The proposed action may result in the modification or destruction of, or inhibit access to, any unique or unusual land forms on the site (e.g., cliffs, dunes, minerals, fossils, caves). (See Part 1. E.2.g)

☑ NO ☐ YES

If "Yes", answer questions a - c. If "No", move on to Section 3.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. Identify the specific land form(s) attached:	E2g	☐	☐
b. The proposed action may affect or is adjacent to a geological feature listed as a registered National Natural Landmark. Specific feature:	E3c	☐	☐
c. Other impacts:		☐	☐

3. Impacts on Surface Water

The proposed action may affect one or more wetlands or other surface water bodies (e.g., streams, rivers, ponds or lakes). (See Part 1. D.2, E.2.h)

☐ NO ☑ YES

If "Yes", answer questions a - l. If "No", move on to Section 4.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may create a new water body.	D2b, D1h	☐	☑
b. The proposed action may result in an increase or decrease of over 10% or more than a 10 acre increase or decrease in the surface area of any body of water.	D2b	☐	☑
c. The proposed action may involve dredging more than 100 cubic yards of material from a wetland or water body.	D2a	☐	☑
d. The proposed action may involve construction within or adjoining a freshwater or tidal wetland, or in the bed or banks of any other water body.	E2h	☐	☑
e. The proposed action may create turbidity in a waterbody, either from upland erosion, runoff or by disturbing bottom sediments.	D2a, D2h	☐	☑
f. The proposed action may include construction of one or more intake(s) for withdrawal of water from surface water.	D2c	☑	☐
g. The proposed action may include construction of one or more outfall(s) for discharge of wastewater to surface water(s).	D2d	☐	☑
h. The proposed action may cause soil erosion, or otherwise create a source of stormwater discharge that may lead to siltation or other degradation of receiving water bodies.	D2e	☑	☐
i. The proposed action may affect the water quality of any water bodies within or downstream of the site of the proposed action.	E2h	☐	☑
j. The proposed action may involve the application of pesticides or herbicides in or around any water body.	D2q, E2h	☐	☑
k. The proposed action may require the construction of new, or expansion of existing, wastewater treatment facilities.	D1a, D2d	☑	☐

l. Other impacts:		☐	☐

4. Impact on groundwater

The proposed action may result in new or additional use of ground water, or may have the potential to introduce contaminants to ground water or an aquifer. (See Part 1. D.2.a, D.2.c, D.2.d, D.2.p, D.2.q, D.2.t) ☐ NO ☑ YES

If "Yes", answer questions a - h. If "No", move on to Section 5.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may require new water supply wells, or create additional demand on supplies from existing water supply wells.	D2c	☑	☐
b. Water supply demand from the proposed action may exceed safe and sustainable withdrawal capacity rate of the local supply or aquifer. Cite Source:	D2c	☑	☐
c. The proposed action may allow or result in residential uses in areas without water and sewer services.	D1a, D2c	☑	☐
d. The proposed action may include or require wastewater discharged to groundwater.	D2d, E2l	☑	☐
e. The proposed action may result in the construction of water supply wells in locations where groundwater is, or is suspected to be, contaminated.	D2c, E1f, E1g, E1h	☑	☐
f. The proposed action may require the bulk storage of petroleum or chemical products over ground water or an aquifer.	D2p, E2l	☑	☐
g. The proposed action may involve the commercial application of pesticides within 100 feet of potable drinking water or irrigation sources.	E2h, D2q, E2l, D2c	☐	☑
h. Other impacts:		☐	☐

5. Impact on Flooding

The proposed action may result in development on lands subject to flooding. (See Part 1. E.2) ☐ NO ☑ YES

If "Yes", answer questions a - g. If "No", move on to Section 6.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may result in development in a designated floodway.	E2i	☑	☐
b. The proposed action may result in development within a 100-year or a 500-year floodplain.	E2j, E5a, E5b	☑	☐
c. The proposed action may result in development in an area potentially affected by sea level rise.	E2k, E5c	☑	☐
d. The proposed action may result in, or require, modification of existing drainage patterns.	D2b, D2e	☐	☑
e. The proposed action may change flood water flows that contribute to flooding.	D2b, E2i, E2j, E2k	☐	☑
f. If there is a dam located on the site of the proposed action, is the dam in need of repair, or upgrade?	E1e	☑	☐

g. Other impacts:		☐	☐

6. Impacts on Air and Climate

The proposed action may include a state regulated air emission source. (See Part 1. D.2.f., D.2.h, D.2.g) or generate greenhouse gas emissions over 10,000 metric tons of carbon dioxide equivalents (See Part 1. D.2.h)

☐ NO ☑ YES

If "Yes", answer questions a - i. If "No", move on to Section 7.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. If the proposed action requires federal or state air emission permits, the action mayalso have the potential to emit one or more regulated air contaminants at or above the following levels:	D2g	☐	☑
i. More than 100 short tons/year of carbon monoxide (CO)	D2g	☑	☐
ii. More than 100 short tons/year of oxides of nitrogen (NO_x) outside the NYC Metropolitan Area or Long Island OR 25 short tons/year within the NYC Metropolitan Area or Long Island	D2g	☑	☐
iii. More than 100 short tons/year of particulate matter (PM-10, PM-2.5)	D2g	☐	☑
iv. More than 50 short tons/year of volatile organic compounds (VOC) outside the NYC Metropolitan Area or Long Island OR 25 short tons/year within the NYC Metropolitan Area or Long Island	D2g	☑	☐
v. More than 100 short tons/year of sulfur dioxide (SO_2)			
b. The proposed action has the potential to emit 10 short tons/year or more of any one designated hazardous air pollutant, or 25 short tons/year or more of any combination of such hazardous air pollutants.	D2g	☐	☑
c. The proposed action may include a heat source capable of producing more than 20 million BTUs per hour.	D2f, D2g	☑	☐
d. The proposed action may exceed 50% of any of the thresholds in "a" or "b", above.	D2g	☐	☑
e. The proposed action may result in the combustion or thermal treatment of solid, hazardous, or hospital/medical/infectious waste.	D2f, D2s	☑	☐
f. The proposed action is subject to the Nonattainment New Source Review or Prevention of Significant Deterioration requirements discussed in 6 NYCRR Part 231.	D2g	☑	☐
g. The proposed action will emit more than 10,000 metric tons of CO2 equivalents per year.	D2h	☐	☑
h. A municipality adopted comprehensive or individual plan addressing climate change applies to the proposed action and the proposed action would materially conflict with the achievement of one or more goals of the plan related to climate change.	C2d	☑	☐
i. Other impacts:		☐	☐

7. Impact on Plants and Animals

The proposed action may result in a loss of flora or fauna. (See Part 1. E.2. m.-q.) ☐ NO ☑ YES

If "Yes", answer questions a - j. If "No", move on to Section 8.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may cause reduction in population or loss of individuals of any threatened or endangered species, as listed by New York State or the Federal government, that use the site, or are found on, over, or near the site.	E2o	☑	☐
b. The proposed action may result in a reduction or degradation of any habitat used by any rare, threatened or endangered species, as listed by New York State or the federal government.	E2o	☑	☐
c. The proposed action may cause reduction in population, or loss of individuals, of any species of special concern or conservation need, as listed by New York State or the Federal government, that use the site, or are found on, over, or near the site.	E2p	☑	☐
d. The proposed action may result in a reduction or degradation of any habitat used by any species of special concern and conservation need, as listed by New York State or the Federal government.	E2p	☑	☐

e. The proposed action may diminish the capacity of a registered National Natural Landmark to support the biological community it was established to protect.	E3c	☑	☐
f. The proposed action may result in the removal of, or ground disturbance in, any portion of a designated significant natural community. Source:	E2n	☑	☐
g. The proposed action may substantially interfere with nesting/breeding, foraging, or over-wintering habitat for the predominant species that occupy or use the project site.	E2m	☐	☑
h. The proposed action requires the conversion of more than 10 acres of forest, grassland or any other regionally or locally important habitat. Habitat type & information source: _____	E1b	☐	☑
i. Proposed action (commercial, industrial or recreational projects, only) involves use of herbicides or pesticides.	D2q	☐	☑
j. Other impacts:		☐	☐

8. Impact on Agricultural Resources

The proposed action may impact agricultural resources. (See Part 1. E.3.a. and b.) ☐ NO ☑ YES

If "Yes", answer questions a - h. If "No", move on to Section 9.

	Relevant Part I Question(s)	**No, or small impact may occur**	**Moderate to large impact may occur**
a. The proposed action may impact soil classified within soil group 1 through 4 of the NYS Land Classification System.	E2c, E3b	☐	☑
b. The proposed action may sever, cross or otherwise limit access to agricultural land (includes cropland, hayfields, pasture, vineyard, orchard, etc).	E1a, Elb	☑	☐
c. The proposed action may result in the excavation or compaction of the soil profile of active agricultural land.	E3b	☐	☑
d. The proposed action may irreversibly convert agricultural land to non-agricultural uses, either more than 2.5 acres if located in an Agricultural District, or more than 10 acres if not within an Agricultural District.	E1b, E3a	☐	☑
e. The proposed action may disrupt or prevent installation of an agricultural land management system.	El a, E1b	☐	☑
f. The proposed action may result, directly or indirectly, in increased development potential or pressure on farmland.	C2c, C3, D2c, D2d	☑	☐
g. The proposed project is not consistent with the adopted municipal Farmland Protection Plan.	C2c	☑	☐
h. Other impacts: _____		☐	☐

9. Impact on Aesthetic Resources

The land use of the proposed action is obviously different from, or are in sharp contrast to, current land use patterns between the proposed project and a scenic or aesthetic resource. (Part 1. E.1.a, E.1.b, E.3.h.)

☑ NO ☐ YES

If "Yes", answer questions a - g. If "No", go to Section 10.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. Proposed action may be visible from any officially designated federal, state, or local scenic or aesthetic resource.	E3h	☐	☐
b. The proposed action may result in the obstruction, elimination or significant screening of one or more officially designated scenic views.	E3h, C2b	☐	☐
c. The proposed action may be visible from publicly accessible vantage points: i. Seasonally (e.g., screened by summer foliage, but visible during other seasons) ii. Year round	E3h	☐ ☐	☐ ☐
d. The situation or activity in which viewers are engaged while viewing the proposed action is: i. Routine travel by residents, including travel to and from work ii. Recreational or tourism-based activities	E3h E2q, E1c	☐ ☐	☐ ☐
e. The proposed action may cause a diminishment of the public enjoyment and appreciation of the designated aesthetic resource.	E3h	☐	☐
f. There are similar projects visible within the following distance of the proposed project: 0-1/2 mile ½ -3 mile 3-5 mile 5+ mile	D1a, E1a, D1f, D1g	☐	☐
g. Other impacts:		☐	☐

10. Impact on Historic and Archeological Resources

The proposed action may occur in or adjacent to a historic or archaeological resource. (Part 1. E.3.e, f. and g.)

☐ NO ☑ YES

If "Yes", answer questions a - e. If "No", go to Section 11.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may occur wholly or partially within, or substantially contiguous to, any buildings, archaeological site or district which is listed on the National or State Register of Historical Places, or that has been determined by the Commissioner of the NYS Office of Parks, Recreation and Historic Preservation to be eligible for listing on the State Register of Historic Places.	E3e	☐	☑
b. The proposed action may occur wholly or partially within, or substantially contiguous to, an area designated as sensitive for archaeological sites on the NY State Historic Preservation Office (SHPO) archaeological site inventory.	E3f	☐	☑
c. The proposed action may occur wholly or partially within, or substantially contiguous to, an archaeological site not included on the NY SHPO inventory. Source:	E3g	☐	☑

d. Other impacts:		☐	☐
e. If any of the above (a-d) are answered "Moderate to large impact may occur", continue with the following questions to help support conclusions in Part 3:			
i. The proposed action may result in the destruction or alteration of all or part of the site or property.	E3e, E3g, E3f	☐	☑
ii. The proposed action may result in the alteration of the property's setting or integrity.	E3e, E3f, E3g, E1a, E1b	☐	☑
iii. The proposed action may result in the introduction of visual elements which are out of character with the site or property, or that may alter its setting.	E3e, E3f, E3g, E3h, C2, C3	☐	☑

11. Impact on Open Space and Recreation

The proposed action may result in a loss of recreational opportunities or a reduction of an open space resource as designated in any adopted municipal open space plan.
(See Part 1. C.2.c, E.1.c., E.2.q.)
If "Yes", answer questions a - e. If "No", go to Section 12.

☐ NO ☑ YES

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may result in an impairment of natural functions, or "ecosystem services", provided by an undeveloped area, including but not limited to stormwater storage, nutrient cycling, wildlife habitat.	D2e, E1b E2h, E2m, E2o, E2n, E2p	☐	☑
b. The proposed action may result in the loss of a current or future recreational resource.	C2a, E1c, C2c, E2q	☑	☐
c. The proposed action may eliminate open space or recreational resource in an area with few such resources.	C2a, C2c E1c, E2q	☑	☐
d. The proposed action may result in loss of an area now used informally by the community as an open space resource.	C2c, E1c	☑	☐
e. Other impacts: _____		☐	☐

12. Impact on Critical Environmental Areas

The proposed action may be located within or adjacent to a critical environmental area (CEA). (See Part 1. E.3.d)
If "Yes", answer questions a - c. If "No", go to Section 13.

■ NO ☐ YES

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may result in a reduction in the quantity of the resource or characteristic which was the basis for designation of the CEA.	E3d	☐	☐
b. The proposed action may result in a reduction in the quality of the resource or characteristic which was the basis for designation of the CEA.	E3d	☐	☐
c. Other impacts: _____		☐	☐

13. Impact on Transportation
The proposed action may result in a change to existing transportation systems. ■ NO ☐ YES
(See Part 1. D.2.j)
If "Yes", answer questions a - f. If "No", go to Section 14.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. Projected traffic increase may exceed capacity of existing road network.	D2j	☐	☐
b. The proposed action may result in the construction of paved parking area for 500 or more vehicles.	D2j	☐	☐
c. The proposed action will degrade existing transit access.	D2j	☐	☐
d. The proposed action will degrade existing pedestrian or bicycle accommodations.	D2j	☐	☐
e. The proposed action may alter the present pattern of movement of people or goods.	D2j	☐	☐
f. Other impacts:		☐	☐

14. Impact on Energy
The proposed action may cause an increase in the use of any form of energy. ☐ NO ■ YES
(See Part 1. D.2.k)
If "Yes", answer questions a - e. If "No", go to Section 15.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action will require a new, or an upgrade to an existing, substation.	D2k	✔	☐
b. The proposed action will require the creation or extension of an energy transmission or supply system to serve more than 50 single or two-family residences or to serve a commercial or industrial use.	D1f, D1q, D2k	✔	☐
c. The proposed action may utilize more than 2,500 MWhrs per year of electricity.	D2k	✔	☐
d. The proposed action may involve heating and/or cooling of more than 100,000 square feet of building area when completed.	D1g	☐	✔
e. Other Impacts:		☐	☐

15. Impact on Noise, Odor, and Light
The proposed action may result in an increase in noise, odors, or outdoor lighting. ☐ NO ■ YES
(See Part 1. D.2.m., n., and o.)
If "Yes", answer questions a - f. If "No", go to Section 16.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may produce sound above noise levels established by local regulation.	D2m	✔	☐
b. The proposed action may result in blasting within 1,500 feet of any residence, hospital, school, licensed day care center, or nursing home.	D2m, E1d	☐	✔
c. The proposed action may result in routine odors for more than one hour per day.	D2o	✔	☐

d. The proposed action may result in light shining onto adjoining properties.	D2n	☐	☑
e. The proposed action may result in lighting creating sky-glow brighter than existing area conditions.	D2n, E1a	☐	☑
f. Other impacts:		☐	☐

16. Impact on Human Health

The proposed action may have an impact on human health from exposure to new or existing sources of contaminants. (See Part 1.D.2.q., E.1. d. f. g. and h.) ☐ NO ■ YES

If "Yes", answer questions a - m. If "No", go to Section 17.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action is located within 1500 feet of a school, hospital, licensed day care center, group home, nursing home or retirement community.	E1d	☑	☐
b. The site of the proposed action is currently undergoing remediation.	E1g, E1h	☑	☐
c. There is a completed emergency spill remediation, or a completed environmental site remediation on, or adjacent to, the site of the proposed action.	E1g, E1h	☑	☐
d. The site of the action is subject to an institutional control limiting the use of the property (e.g., easement or deed restriction).	E1g, E1h	☑	☐
e. The proposed action may affect institutional control measures that were put in place to ensure that the site remains protective of the environment and human health.	E1g, E1h	☑	☐
f. The proposed action has adequate control measures in place to ensure that future generation, treatment and/or disposal of hazardous wastes will be protective of the environment and human health.	D2t	☑	☐
g. The proposed action involves construction or modification of a solid waste management facility.	D2q, E1f	☑	☐
h. The proposed action may result in the unearthing of solid or hazardous waste.	D2q, E1f	☑	☐
i. The proposed action may result in an increase in the rate of disposal, or processing, of solid waste.	D2r, D2s	☑	☐
j. The proposed action may result in excavation or other disturbance within 2000 feet of a site used for the disposal of solid or hazardous waste.	E1f, E1g E1h	☑	☐
k. The proposed action may result in the migration of explosive gases from a landfill site to adjacent off-site structures.	E1f, E1g	☑	☐
l. The proposed action may result in the release of contaminated leachate from the project site.	D2s, E1f, D2r	☐	☑
m. Other impacts:		☐	☐

17. Consistency with Community Plans

The proposed action is not consistent with adopted land use plans. ☑ NO ☐ YES

(See Part 1. C.1, C.2. and C.3.)

If "Yes", answer questions a - h. If "No", go to Section 18.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action's land use components may be different from, or in sharp contrast to, current surrounding land use pattern(s).	C2, C3, D1a E1a, E1b	☐	☐
b. The proposed action will cause the permanent population of the city, town or village in which the project is located to grow by more than 5%.	C2	☐	☐
c. The proposed action is inconsistent with local land use plans or zoning regulations.	C2, C2, C3	☐	☐
d. The proposed action is inconsistent with any County plans, or other regional land use plans.	C2, C2	☐	☐
e. The proposed action may cause a change in the density of development that is not supported by existing infrastructure or is distant from existing infrastructure.	C3, D1c, D1d, D1f, D1d, Elb	☐	☐
f. The proposed action is in an area characterized by low density developmentthat will require new or expanded public infrastructure.	C4, D2c, D2d D2j	☐	☐
g. The proposed action may induce secondary development impacts (e.g., residential or commercial development not included in the proposed action)	C2a	☐	☐
h. Other:		☐	☐

18. Consistency with Community Character

The proposed project is inconsistent with the existing community character. ☑ NO ☐ YES

(See Part 1. C.2, C.3, D.2, E.3)

If "Yes", answer questions a - g. If "No", proceed to Part 3.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action may replace or eliminate existing facilities, structures, or areas of historic importance to the community.	E3e, E3f, E3g	☐	☐
b. The proposed action may create a demand for additional community services (e.g. schools, police and fire)	C4	☐	☐
c. The proposed action may displace affordable or low-income housing in an area where there is a shortage of such housing.	C2, C3, D1f D1g, E1a	☐	☐
d. The proposed action may interfere with the use or enjoyment of officially recognized or designated public resources.	C2, E3	☐	☐
e. The proposed action is inconsistent with the predominant architectural scale and character.	C2, C3	☐	☐
f. Proposed action is inconsistent with the character of the existing natural landscape.	C2, C3 E1a, E1b E2g, E2h	☐	☐
g. Other impacts:		☐	☐

19. Impact on Disadvantaged Communities

The proposed project may impact a disadvantaged community. (See Part 1. E.4) ☑ NO ☐ YES

If "Yes", answer questions a - g . If "No", proceed to Part 3.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. Is the potentially affected disadvantaged community identified as having comparatively higher burdens or vulnerabilities by the Disadvantaged Community Assessment Tool?	E.4.c	☐	☐
b. The proposed action may create new air emissions or increase existing air emissions within a disadvantaged community.	D.2.f-i, E.4	☐	☐
c. The proposed action may create new wastewater treatment or discharges, or expand existing wastewater treatment or discharges, within a disadvantaged community.	D.2.d	☐	☐
d. The proposed action creates or expands a solid or hazardous waste management facility, or involves the generation of solid or hazardous waste, within or near a disadvantaged community.	D.2.r, D.2.s, D.2.t, E.1.f, E.1.g	☐	☐
e. The proposed action may increase traffic within a disadvantaged community.	D.2.j	☐	☐
f. The proposed action affects or involves one or more of the following facility types: i. landfill; ii. other industrial, manufacturing, or mining land uses; iii. major oil or chemical bulk storage facility; iv. municipal waste combustor; v. power generation facility; vi. risk management plan site; vii. remediation site; or viii. scrap metal processor.	C.3.c, D.1.a, D.1.g, D.2.a, D.2.d, D.2.f, E.1.a, E.1.b. E.1.h, E.1.v, E.4	☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐
g. Other impacts:		☐	☐

20. Future Physical Climate Risks

The proposed project may be vulnerable to future physical climate risks or increase the vulnerability of human or ecological communities to future physical climate risks. ☑ NO ☐ YES

(See Part 1. E.5)

If "Yes", answer questions a - e. If "No", proceed to Part 3.

	Relevant Part I Question(s)	No, or small impact may occur	Moderate to large impact may occur
a. The proposed action is vulnerable to damage from a projected 100-year flood.	E2j, E5a	☐	☐
b. The proposed action is vulnerable to damage from a 500-year flood.	E2k, E5b	☐	☐
c. The proposed action is in an area potentially affected by sea level rise.	E5c	☐	☐
d. The proposed action may increase the vulnerability of human or ecological communities to the following:	E5d	☐	☐
i. drought		☐	☐
ii. temperature extremes (hot or cold)		☐	☐
iii. extreme storms, including high winds		☐	☐
iv. landslides		☐	☐
v. coastal erosion		☐	☐
vi. stormwater flooding		☐	☐
vii. other climate or weather hazards? If yes, describe: _____		☐	☐
e. Other impacts:		☐	☐

Full Environmental Assessment Form
Part 3 - Evaluation of the Magnitude and Importance of Project Impacts
and
Determination of Significance

Part 3 provides the reasons in support of the determination of significance. The lead agency must complete Part 3 for every question in Part 2 where the impact has been identified as potentially moderate to large or where there is a need to explain why a particular element of the proposed action will not, or may, result in a significant adverse environmental impact.

Based on the analysis in Part 3, the lead agency must decide whether to require an environmental impact statement to further assess the proposed action or whether available information is sufficient for the lead agency to conclude the proposed action will not have a significant adverse environmental impact. By completing the certification on the next page, the lead agency can complete its determination of significance.

Reasons Supporting This Determination:
To complete this section:

- Identify the impact based on the Part 2 responses and describe its magnitude. Magnitude considers factors such as severity, size, or extent of an impact.
- Assess the importance of the impact. Importance relates to the geographic scope, duration, probability of the impact occurring, number of people affected by the impact, and any additional environmental consequences if the impact were to occur.
- The assessment should take into consideration any design element or project changes.
- Repeat this process for each Part 2 question where the impact has been identified as potentially moderate to large or where there is a need to explain why a particular element of the proposed action will not, or may, result in a significant adverse environmental impact.
- Provide the reason(s) why the impact may, or will not, result in a significant adverse environmental impact.
- For Conditional Negative Declarations identify the specific condition(s) imposed that will modify the proposed action so that no significant adverse environmental impacts will result.
- Attach additional sheets, as needed.

See attached document

Determination of Significance - Type 1 and Unlisted Actions

SEQR Status: ☑ Type 1 ☐ Unlisted

Identify portions of EAF completed for this Project: ☑ Part 1 ☑ Part 2 ☑ Part 3

Upon review of the information recorded on this EAF, as noted, plus this additional support information

on a separate document

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and considering both the magnitude and importance of each identified potential impact, it is the conclusion of the NYSDEC as lead agency that:

☐ A. This project will result in no significant adverse impacts on the environment, and, therefore, an environmental impact statement need not be prepared. Accordingly, this negative declaration is issued.

☐ B. Although this project could have a significant adverse impact on the environment, that impact will be avoided or substantially mitigated because of the following conditions that will be required by the lead agency:

There will, therefore, be no significant adverse impacts from the project as conditioned, and, therefore, this conditioned negative declaration is issued. A conditioned negative declaration may be used only for UNLISTED actions (see 6 NYCRR 617.7(d)).

☑ C. This Project may result in one or more significant adverse impacts on the environment and an environmental impact statement must be prepared to further assess the impact(s) and possible mitigation and to explore alternatives to avoid or reduce those impacts. Accordingly, this positive declaration is issued.

Name of Action: Kilbourne Graphite Project

Name of Lead Agency: NYSDEC

Name of Responsible Officer in Lead Agency: Miranda Gilgore

Title of Responsible Officer: Deputy Regional Permit Administrator

Signature of Responsible Officer in Lead Agency: Miranda gilgore Date: 11/10/2026

Signature of Preparer (if different from Responsible Officer) Date:

For Further Information:

Contact Person: Miranda Gilgore

Address: 317 Washington St. Watertown, NY 13601

Telephone Number: (315) 704-6296

E-mail: miranda.gilgore@dec.ny.gov

For Type 1 Actions and Conditioned Negative Declarations, a copy of this Notice is sent to:

Chief Executive Officer of the political subdivision in which the action will be principally located (e.g., Town / City / Village of)
Other involved agencies (if any)
Applicant (if any)
Environmental Notice Bulletin: http://www.dec.ny.gov/enb/enb.html

Print

State Environmental Quality Review
POSITIVE DECLARATION
Notice of Intent to Prepare a Draft EIS
EAF Part 3 Attachment - Determination of Significance

DEC Facility ID: 6-4038-00024 (MLR No. 60027; SPDES No. NY0001791)

Date: November 10, 2026

This notice is issued pursuant to Part 617 of the implementing regulations pertaining to Article 8 (State Environmental Quality Review Act) of the Environmental Conservation Law.

The NYS Department of Environmental Conservation (DEC), as lead agency, has determined that the proposed action described below may have a potential significant adverse impact on the environment and that a Draft Environmental Impact Statement will be prepared.

Name of Action: Kilbourne Graphite Project – ESM Balmat Mines and Mill

SEQR Status: Type I

Note: The public scoping process will help to ensure that the required Draft Environmental Impact Statement focuses on relevant issues.

Description of Action: The Kilbourne Graphite Project includes an open-pit mine, associated waste rock and tailings management facilities, and an on-site processing plant. This would include a fully integrated natural flake graphite mine and processing facility producing up to 40,000 tons per year of graphite concentrate along with purified and micronized products for industrial, energy, and defense applications. Total project disturbance is expected to be approximately 1,260 acres, 774 acres of which is new disturbance. The project is located in the Town of Fowler, St. Lawrence County, New York.

Location: 408 Sylvia Lake Rd. Gouverneur, NY 13643

Reasons Supporting This Determination:

Impacts on Land

1. The proposed action is a large-scale open pit mine, tailings storage, and processing facility that will physically disturb up to 1,261 acres and remove 29.664 million tons of mill feed, 42.98 million tons of waste rock, and 9.25 million

tons of overburden. The disturbance will convert several acres of land to impervious surface and will also extend below the water table.
2. Graphite mining at the site is proposed to last 20 years. Therefore, impacts from noise and light will be chronic as opposed to acute. The impact on the land resources will be irreversible in many cases, due to the extractive nature of mining.
3. Destruction of vegetation and creation of impervious surfaces may increase the risk of erosion on site.

Impacts on Surface Water

1. The project includes destruction of 195 acres of wetland and 40 acres of other surface water features.
2. The proposed project includes the draining of a talc tremolite mine that was reclaimed as a lake (the Arnold Pit) to make room for tailings. While the loss of the water in the Arnold Pit is not a habitat concern, the redirection of the water and the chemicals it may contain is a concern. Some of the water will be used as process water, but any water that cannot be used as process water, and must be displaced for incoming tailings, will be discharged. This creates the potential for increased flow in the receiving water which could create turbidity and increased erosion as well as harm from contaminants that may be in the water.
3. The applicant proposes to apply pesticides to control phragmites. Depending on where the application will occur and the size of the area, the pesticides could significantly impact waterbodies, wetlands, or groundwater. The pesticides may adversely impact non-target species and also have a negative impact on human health.
4. Nearby Sylvia Lake is a drinking water source, listed as Class AA. Therefore, any contamination of the water body could have large adverse impacts on human health and the environment. See also the Impacts on Human Health section below.

Impacts on groundwater

1. As stated above, the applicant proposes to apply pesticides to control phragmites. Depending on where the application will occur and the size of the area, the pesticides could impact groundwater used for potable water or irrigation.

Impact on flooding

1. The project will create new drainage patterns to route water from the Arnold Pit, route stormwater, and tailings slurry. The project sponsor will also be creating dams to contain tailings into basins. Additionally, the development of the site may affect the drainage patterns of water that would otherwise flow to or from the site.

2. DEC currently does not have information to assess the risk of flooding at the site but is cognizant of the large amounts of water and tailings slurry that will be routed as part of the project. The project will create 150,000 square feet of impervious surface which may increase the risk of flooding.

Impacts on Air and Climate

1. Emissions of particulate matter are predicted to be over the major source thresholds for air permitting. The project will also likely emit more than 10,000 metric tons of CO2 equivalents per year.
2. The project has the potential to emit 10 short tons/year or more of any one designated hazardous air pollutant, or 25 short tons/year or more of any combination of such hazardous air pollutants.

Impact on Plants and Animals

1. The project will destroy 400 acres of forest, which may disrupt wildlife habitat. Use of pesticides may have an impact on wildlife species as well.

Impact on Agricultural Resources

1. Portions of the project are located in an agricultural district and will irreversibly convert agricultural land to non-agricultural land.

Impact on Historic and Archeological Resources

1. The project sponsor has been coordinating with the NYS Office of Parks, Recreation, and Historic Preservation's Division for Historic Preservation (SHPO). SHPO has requested a Phase 1B archeological survey. Shovel testing is currently underway, and a SHPO determination of impact is forthcoming, which will help inform the evaluation of potential significant adverse impacts to historic and archaeological resources.

Impact on Open Space and Recreation

1. The project will result in the destruction of freshwater wetlands which provide ecosystem services. The alteration of the landscape may also have an adverse impact on stormwater storage and wildlife habitat. In addition to the destruction of 195 acres of wetland, the project will also convert 400 acres of forest to other cover types.

Impact on Energy

1. The project may involve heating and/or cooling of 150,000 square feet, which may have a potentially significant adverse impact on energy resources

Impact on Noise, Odor, and Light

1. The project will involve blasting. Submitted maps show that the graphite mining will occur on the north end of the property near County Route 22. There are several residences just across the street from where blasting may occur.
2. An expanded mine footprint may also result in increased lighting on the site which could result in spillover or light pollution in a region that does not currently have significant nighttime sky-glow.

Impact on Human health

1. The project may result in the release of contaminated leachate from zinc tailings that will be displaced or from graphite tailings created because of the project. As discussed in the Impacts on Surface Waters section, nearby Sylvia Lake is used as a source of drinking water so any impacts to the water could be significant and adverse on human health.