455 Phillip Street, Unit 100A
Waterloo, Ontario N2L 3X2
Canada
ghd.com

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Mr. Matthew Fitzgerald
Partner, Phillips Lytle LLP
125 Main Street
Buffalo, New York
14023

GHD Final Peer Review Close-Out of Noise Impact Assessment – Proposed STREAM Facility
6590 Crosby Road, Alabama, New York

Dear Mr. Fitzgerald:

1. Introduction

GHD was retained by Phillips Lytle LLP on behalf of Genesee County Economic Development Center (GCEDC) to complete a peer review of the noise impact assessment materials prepared by Ramboll for STREAM U.S. Data Centers' proposed Project Double Reed data center facility at the STAMP site in Alabama, New York.

GHD previously issued peer review letters dated April 20, 2026 and May 22, 2026 with associated comments on previous versions of the Ramboll Assessment's. GHD also provided follow-up written comments to Ramboll and STREAM by email on June 5 and June 26, 2026 after reviewing the May 27, 2026 Assessment and associated model revisions. Those letters and the June 5 & 26 emails identified the technical information, modelling inputs, operating assumptions, mitigation details, and supporting analyses that GHD considered necessary for GCEDC and the reviewing parties to understand whether the proposed Facility's noise impacts had been adequately assessed. GHD also participated in follow-up correspondence and technical discussions regarding Ramboll's updated work product, including generator and chiller specifications, transformer sound levels, low-frequency noise and tonality evaluations, modelling methodology, and administrative operating controls.

Since GHD's May 22, 2026 peer review letter and June 5 & 26, 2026 email comments, Ramboll has prepared a further updated Noise Impact Assessment (Assessment) titled "Project Double Reed – STAMP Site – Genesee County, NY – Noise Modeling Results," dated June 29, 2026. GHD has reviewed that Assessment, together with the prior peer review correspondence, updated technical materials, and related project correspondence. This letter is intended to provide a final consolidated summary of the peer review items previously identified by GHD and to document how each item has been addressed in Ramboll's latest Assessment.

The following items were reviewed by GHD:

– Ramboll, "Noise Modeling Results," dated February 12, 2026
– Ramboll, "Revised Noise Modeling Results" Technical Memorandum, dated March 10, 2026
– Ramboll, "Noise Modeling Results," dated April 23, 2026

– Ramboll, “Project Double Reed – STAMP Site – Genesee County, NY – Noise Modeling Results,” dated June 29, 2026 (the Assessment)

– “Attachment 1 – Acoustical Review of Application,” prepared by Noise Pollution Clearinghouse, dated April 16, 2026 (NPC Report 1)

– “Supplement to Acoustical Review of Application Dated April 16, 2026,” prepared by Noise Pollution Clearinghouse, dated May 10, 2026 (NPC Report 2)

– “III-a Architectural Massing and Elevations BUFA – GCEDC Application,” revised April 6, 2026

– “III-c | Site Plans 1 of 2,” prepared by Bowman Consulting Engineering, Land Surveying & Landscape Architecture, revised June 26, 2026

– “III-i Utility Power Technical Summary BUFA – GCEDC Application,” revised April 6, 2026;

– CadnaA model materials provided by Ramboll

– Generator specification correspondence provided in June 2026

– Related email correspondence and technical comments exchanged among GHD, Phillips Lytle, Ramboll, STREAM, and the project team

– Summary of representative public comments received by GCEDC regarding project noise impacts

The following items were previously prepared by GHD in response to the reviewed documents:

– GHD, “Peer Review of Noise Impact Assessment,” dated April 20, 2026

– GHD, “Peer Review of Updated Noise Impact Assessment,” dated May 22, 2026

– GHD, “GHD Acoustic Review of Stream Noise Assessment” email comments, dated June 5, 2026

– GHD, “Last Items for Double Reed Peer Review – Acoustics” email comments, dated June 26, 2026

This letter summarizes the technical issues GHD identified through its peer review and confirms how they have been addressed in Ramboll’s latest assessment. Based on GHD’s review of the Assessment, GHD considers the peer review complete, subject to the implementation of the documented operating assumptions, mitigation commitments, equipment selections, and post-construction verification measures unilaterally proposed by STREAM. Based on GHD’s final peer review of the Assessment, GHD concludes that the analysis and conclusions in the Assessment are accurate and based on best available science and methodology. GHD further concludes that Assessment fully satisfies and resolves the comments and critiques provided in the public comments and NPC Reports 1 & 2, and any outstanding comments from GHD.

For clarity, earlier Ramboll submissions were reviewed as part of the iterative peer review process however GHD’s final peer review conclusion is based on Ramboll’s June 29, 2026 Assessment.

2. Consolidated Peer Review Summary

GHD’s comments generally related to modelling methodology, source inventory, equipment assumptions, receptors, low-frequency noise, tonality, mitigation design, generator and transformer inputs, indoor noise pathways, fan speed controls, and post-construction verification. The following sections summarize each comment category and its close-out status, inclusive of the April 20 and May 22 peer review letters and GHD’s June 5 & 26, 2026 email comments.

2.1 Noise Modelling Methodology and Modelling File Review

GHD requested additional information regarding the CadnaA modelling methodology, including model files, ground absorption, topography, reflection order, meteorological parameters, coordinate reference system, and the version of ISO 9613-2 used for sound propagation.

The Assessment sufficiently addresses these items by documenting use of CadnaA with ISO 9613-2:2024 and identifying key model parameters, including source-receptor geometry, topography, three orders of reflection, universal model ground absorption of 0.4, meteorological conditions, receptor height of 5 feet above grade, reflective building and barrier settings, United States Elevation Data using WGS84, and site-specific elevation assumptions. GHD considers the modelling methodology documentation sufficient and appropriate and the modelling methodology to be appropriate to accurately assess the project noise impacts.

2.2 Building, Source, Barrier, and Receptor Geometry

GHD previously identified inconsistencies between building heights, rooftop screen heights, parapet heights, source heights, and modelled object heights in the prior assessment, architectural drawings, and CadnaA model. GHD also requested confirmation that rooftop screens and barriers would provide appropriate acoustic shielding for chillers located on elevated roof platforms.

The Assessment sufficiently addresses this by providing updated building and rooftop screen descriptions, identifying relevant heights for the north and south campuses, and listing equipment heights in the source summary table. The updated model incorporates the documented mitigation features and demonstrates compliance under the assessed operating scenarios.

GHD considers the source and barrier geometry comments closed, provided final constructed conditions remain consistent with the assumptions documented in Ramboll's Assessment. GHD's June 5 email also noted that the acoustic non-reflectivity of the northern campus rooftop barriers should be stated explicitly; Ramboll's final assessment sufficiently documents the relevant barrier reflection/absorption assumptions, including the potential use of absorptive treatment on the inside face of the north campus rooftop barriers.

2.3 Noise Source Inventory, Source Identification, and Source Location Plans

GHD requested a complete source inventory, including quantities, heights, make/model information, sound level data, unique source IDs, and corresponding source location figures.

The Assessment sufficiently addresses this through Table 1, which summarizes operating scenarios, source heights, make/model information, acoustic model ID tags, sound levels, and operating quantities. Appendix D provides source location figures for chillers, rooftop equipment, and transformers on the north and south campuses.

Ramboll has also corrected the chiller count to 180 total units, based on three buildings with 60 air-cooled chillers each. GHD's June 5 email noted that some Appendix D source-location figures required improved legibility; the final assessment includes expanded Appendix D source location plans for north and south campus chillers, rooftop equipment, and transformers. GHD considers the source inventory and source-location documentation sufficient and appropriate to accurately assess the project noise impacts.

2.4 Chiller, ACCU, DOAS, and RTU Sound Data and Fan Speed Assumptions

GHD requested clear documentation of chiller fan speed assumptions, corresponding sound power levels, and whether the assumed speeds would be operational constraints. GHD also requested supporting sound data for ACCU, DOAS, RTU, and related HVAC equipment.

The Assessment identifies worst-case chiller operation as 100 percent load at 97.2°F with 70 percent fan speed during daytime hours and 100 percent load at 78.2°F with 50 percent fan speed during nighttime hours. It also provides seasonal and return-period fan speed scenarios with associated chiller sound power levels. These project operation assumptions are appropriate and sufficient to provide an accurate assessment of the project noise impacts.

The Assessment specifies additional chiller mitigation in the form of 60-inch-high absorption panels around the chiller fans. The assessment provides manufacturer-specified octave-band insertion loss values for these chiller-top panels and incorporates the associated attenuation into the modelled chiller sound levels. GHD considers this additional mitigation appropriate for close-out, provided the panels are installed with the dimensions, locations, acoustic performance, and construction details assumed in Ramboll's assessment.

The Assessment provides condensing unit and rooftop unit sound data, including fan speed calculations in Appendix B. GHD's June 5 email requested clarification of enforceable fan speed controls and noted a typo in the appendix regarding RTU and DOAS fan speeds. The final Assessment now sufficiently identifies the relevant chiller, condensing unit, and rooftop unit fan speed assumptions and corrects the rooftop unit fan speed basis to 85 percent. GHD considers the equipment sound data and fan speed documentation adequately addressed, provided the operating assumptions in the Assessment are implemented through appropriate detailed design, commissioning, control sequence, administrative, or hard-control mechanisms upon operation of the Facility.

The Assessment identifies 48-inch-high absorption-panel treatments for approximately 60 percent of the rooftop ACCUs on the north campus. GHD's position therefore also relies on the ACCU-top acoustic panels being installed in the locations, approximate quantities, heights, and acoustic performance assumptions reflected in the acoustic model and Assessment.

2.5 Generator Sound Levels, Quantity, and Operating Scenarios

GHD requested clarification of generator make, model, sound levels, maintenance operating assumptions, generator quantity, and consistency between report assumptions and equipment being considered. GHD also requested clarification of generator sound power conversion and octave-band data. GHD's June 5 email further noted that generator modelling was generally agreeable but that the final generator make, model, and sound level should be confirmed because different generator options were still being considered.

The Assessment identifies the generator basis of design as a Generac G14.2L SG/MG300 with weather and sound enclosure, rated at 300 kW, or equivalent alternative unit. The current design includes three (3) emergency generators, one per building. Maintenance testing is limited to daytime hours, and the assessment conservatively models all 3 generators operating simultaneously during maintenance. The emergency scenario evaluates generator-only operation because chillers would ramp down during an outage. GHD considers its generator comments addressed and the generator noise modelling methodology to be appropriate to accurately assess the project noise impacts, provided the final generator selected is equal to or quieter than the modelled basis-of-design unit.

GHD notes that the Assessment indicates that one (1) generator at a time would normally operate during maintenance testing, while the model conservatively evaluates all three (3) generators operating simultaneously during the daytime maintenance scenario. GHD's peer review conclusion relies on the conservative modelled case of 3 simultaneous generators, rather than the less conservative description of 1 generator operating at a time.

2.6 Transformer Noise, Capacity, and Low-Frequency/ Tonal Considerations

GHD initially noted that transformer noise had not been included and later requested reconciliation of substation transformer capacity and sound levels, including low-frequency and tonal considerations. GHD's June 5 email further noted that the proposed 60 MVA substation transformer sound level should be derived in accordance with NEMA TR-1 procedures or otherwise technically justified, and that the transformer capacity should align with the most current Power Utility technical summary.

The Assessment now includes both building service transformers and substation transformers in the source inventory and modelling. Building service transformers are included at 79 dBA sound power level, while eight (8) substation transformers are included with a sound power level of 86 dBA per transformer.

Confirmation of the substation transformer sound levels has been provided by Priority Power and included in the appendix of Ramboll's assessment. It is understood that the substation transformers will run only in the ONAN (Oil Natural, Air Natural) cooling configuration.

The Assessment includes transformer sources in the cumulative modelling and evaluates low-frequency and tonal considerations for the project as a whole. GHD considers the transformer comments sufficiently addressed for peer review close-out to accurately assess the project noise impacts, provided final transformer procurement is controlled such that the installed transformers do not exceed the modelled sound power level, and the specified substation barrier is installed at least 14' tall, unless supplemental analysis or mitigation is completed.

2.7 Low-Frequency Noise, Tonality, and Infrasound

GHD requested a quantitative low-frequency noise assessment, including dBC–dBA analysis and receptor-based spectral review. GHD also requested a robust quantitative tonality assessment and noted that tonal penalties or conservative criteria adjustments may be required if tonality could not be ruled out.

The Assessment adequately addresses these items through a dedicated low-frequency and infrasound section, a receptor-based dBC–dBA analysis, and octave-band results for the worst-case residential receptor. In response to GHD's June 5 email, the final assessment provides octave-band dBZ, dBA, and dBC results for the nearest residential receptor to the project (R7) and considers the 31.5 Hz and 63 Hz low-frequency bands. The results indicate that no receptor exhibited a dBC–dBA difference greater than 8 dB, and no residential receptor exceeded a difference of 6 dB, for the constant steady-state operating condition. Higher dBC–dBA differences are reported for emergency and maintenance scenarios, but those scenarios are temporary and short-term. Per ANSI 12.9 guidance, the 31.5 Hz and 63 Hz bands are shown to be less than 65 dBZ.

The Assessment also discusses infrasound, generally defined as airborne sound below 20 Hz. Ramboll notes that infrasound is commonly present in the natural and built environment from sources such as wind, weather systems, transportation, and industrial activity, and that applicable community noise standards are not based on infrasonic frequency metrics. Based on the equipment selection, operating characteristics, and predicted sound levels, Ramboll appropriately concludes that the proposed data center is not expected to generate unbalanced low-frequency noise or infrasound at levels detrimental to the surrounding community or wildlife. GHD considers this discussion accurate and sufficient for close-out of outstanding comments because no project-specific infrasound criterion applies and the Assessment does not identify a technical basis for infrasound to be a limiting design or permitting consideration.

The Assessment further includes a tonality evaluation which uses one-third-octave-band data from comparable chiller units because one-third-octave-band data for the specific selected chiller model are not yet available. Ramboll compares those comparable-unit data against ANSI-ASA S12.9 Annex C criteria and concludes that tonal characteristics are not expected. The final Assessment applies a conservative 5 dB reduction to project criteria at residential and reservation receptors as a risk-management measure. GHD considers the low-frequency noise, infrasound, and tonality items appropriately addressed to permit to an accurate assessment of the project noise impacts, subject to Ramboll's post-construction monitoring commitment to verify tonal performance after installation and commissioning.

2.8 Noise Criteria, Receptors, Operating Scenarios, and Compliance Results

GHD reviewed Ramboll's use of the GEIS/Findings Statement limits of 65 dBA daytime and 45 dBA nighttime and the relationship between those limits and the Town of Alabama's non-quantitative "noxious" noise language. GHD also requested that Ramboll clearly identify sensitive receptors, receptor heights, operating scenarios, and results demonstrating predicted project sound levels against applicable criteria.

The Assessment continues to apply the GEIS/Findings limits and explains that the Town of Alabama does not provide independent quantifiable noise limits applicable to the site. The Assessment evaluates project sound

levels against the GEIS/Findings thresholds and applies a 5 dB risk-management reduction at residential and reservation receptors.

The Assessment appropriately identifies receptor locations R1 through R20, including residential receptors, Tonawanda Reservation boundary receptors, property boundary receptors, and one on-site informational receptor. All receptors were modelled at 5 feet above ground level.

The Assessment defines three operating scenarios: Constant Mechanical, Generator Maintenance, and Emergency Generator. The Constant Mechanical scenario includes simultaneous operation of chillers, transformers, condensing units, and rooftop units. Generator Maintenance is limited to daytime hours and conservatively assumes 3 generators operating simultaneously. The Emergency Generator scenario evaluates generator-only operation because chillers would ramp down during a power outage.

The Assessment provides results tables for Day/Night Constant Mechanical, Additional Analysis, Generator Maintenance, and Emergency Generator scenarios. The results demonstrate compliance with the GEIS/Findings criteria and the reduced residential/reservation risk-management limits applied in the assessment. To assess cumulative noise impacts across the STAMP Site, all such compliance was measured from Stream's property line rather than the boundary of the overall STAMP Site. GHD considers the criteria, receptor, operating scenario, and compliance results comments addressed and the modelling methodology to be appropriate to accurately assess the project noise impacts.

2.9 Indoor Noise and Facility Openings

GHD's June 5 email requested clarification of indoor noise and facility openings because a prior version of the assessment referenced "limited openings" without clearly defining whether forced-air ventilation paths existed, particularly in light of indoor UPS system integration and the reduced generator configuration.

The Assessment sufficiently addresses this by stating that indoor data center noise sources are generally contained within the building envelope, do not meaningfully contribute to off-site environmental noise levels, and that there are no forced-air ventilation openings in the building that are not represented in the model. GHD considers this comment addressed.

GHD notes that Ramboll's June 29, 2026 Assessment includes a qualitative construction-noise discussion, including phased construction, working-hour controls, equipment mufflers, potential temporary barriers or sequencing controls near sensitive receptors, and a Construction Traffic Management Plan. GHD's peer review is focused on the operational noise assessment and associated operational mitigation commitments; temporary construction noise controls are therefore understood to be addressed separately through the construction management measures described by Ramboll and any applicable local requirements.

3. Post-Construction Monitoring and Verification

Any unresolved uncertainties regarding final equipment sound data, tonality, and installed performance are to be addressed through appropriate verification. The Assessment includes a post-construction monitoring and evaluation section. Ramboll and Stream have committed to monitoring following completion and commissioning of each individual building, with data-logging sound level meters installed at key property boundary locations for one week during summer (high fan speed) conditions. Ramboll states that monitoring will include overall A-weighted sound levels and one-third-octave-band data, and that the data will be used to confirm compliance and assess potential tonal noise.

Ramboll also states that factory witness testing of the unit will be conducted when available from the manufacturer. GHD considers the post-construction monitoring and factory witness testing commitments important close-out conditions for the peer review, which ensure modelled noise impacts will be realized under the project operating conditions.

4. Detailed Design and Operational Implementation Requirements to Ensure Noise Compliance

Based on the June 29, 2026 Ramboll Assessment, GHD does not identify additional peer review comments requiring further revision of the Assessment, and GHD concludes that the project noise impacts modelled under the Assessment are accurate. However, GHD's peer review conclusion relies on the following design and operational implementation requirements being carried through final design, equipment procurement, construction, commissioning, and Facility operation:

1. The final installed equipment shall be acoustically equivalent to, or quieter than, the equipment sound levels modelled in the June 29, 2026 Assessment.
2. The final generator selection shall be equal to or quieter than the basis-of-design generator modelled in the Assessment.
3. The final substation transformers shall not exceed 86 dBA sound power level under the modelled ONAN/full-load basis, unless supplemental analysis or mitigation is completed. The 14-foot substation barrier shall also be installed in a manner consistent with the modelled location, height, density, and extent.
4. Chiller fan speed assumptions, including daytime and nighttime operating limits, shall be implemented through appropriate operating controls, administrative procedures, or mechanical/computerized control systems.
5. Substation transformers will operate only in the ONAN cooling configuration.
6. The acoustic barriers, rooftop screens, parapets, transformer substation barriers, generator barriers, and chiller-top absorption panels shall be constructed in a manner consistent with the heights, locations, densities, and acoustic assumptions used in the acoustic model and Assessment.
7. Post-construction sound monitoring shall be completed as described by Ramboll following completion and commissioning of each building.
8. One-third-octave-band data collected during post-construction monitoring shall be reviewed for tonal characteristics in accordance with the Assessment methodology.
9. If measured sound levels, tonal characteristics, or equipment performance materially differ from the Assessment assumptions, additional mitigation or operational adjustments shall be implemented as necessary to maintain compliance with the applicable criteria.

5. Peer Review Summary Table

Key Peer Review Area	How Addressed	Close-Out Condition
Modelling methodology	The Assessment documents use of CadnaA with ISO 9613-2:2024 and provides the key model assumptions, including ground absorption, reflection order, receptor height, meteorological inputs, topography, and barrier/building settings.	Model assumptions must remain representative of final design and operating conditions.
Source inventory and geometry	The Assessment identifies equipment quantities, source heights, make/model information, acoustic model ID tags, and source location plans for chillers, rooftop equipment, transformers, and generators.	Final equipment layout and installed source heights must remain consistent with the modelled configuration.

Key Peer Review Area	How Addressed	Close-Out Condition
Chiller and HVAC controls	The Assessment documents daytime and nighttime chiller fan speed assumptions, supporting sound power levels, seasonal/return-period scenarios, ACCU/RTU sound data, and chiller-top acoustic absorption panels.	Fan speed limits and acoustic panel requirements must be implemented through final design, commissioning, controls, and operations.
Generators and transformers	The Assessment updates generator quantity, make/model basis, operating scenarios, transformer inclusion, transformer barriers, and supporting transformer sound level information.	Final generators and transformers must be equal to or quieter than the modelled equipment unless supplemental analysis or mitigation is completed.
Low-frequency noise, tonality, and infrasound	The Assessment provides dBC–dBA analysis, receptor octave-band results, infrasound discussion, similar-chiller tonality review, and a 5 dB risk-management reduction at residential and reservation receptors.	Post-construction monitoring must verify installed sound levels and tonal characteristics.
Compliance results and verification	The Assessment presents results for Constant Mechanical, Generator Maintenance, Emergency Generator, and additional operating scenarios, demonstrating compliance with the GEIS/Findings criteria and reduced residential/reservation criteria.	Post-construction monitoring and factory witness testing remain required close-out commitments.

6. Final Peer Review Conclusion

Based on GHD's review of the June 29, 2026 Ramboll assessment, the associated acoustic modelling, and the related technical correspondence, GHD considers the peer review items identified in the April 20, 2026 and May 22, 2026 review letters, as well as the June 5 & 26, 2026 email comments, to have been addressed.

Ramboll's latest Assessment now adequately documents the key modelling assumptions, source inventory, equipment sound levels, operating scenarios, source and barrier geometry, receptor locations, compliance criteria, low-frequency noise screening, tonality assessment, generator assumptions, transformer assumptions, and post-construction verification commitments sufficient to support the conclusions of the noise Assessment.

GHD therefore considers its peer review of Ramboll's noise assessment work product for Project Double Reed to be complete. Based on GHD's final peer review of the Assessment, GHD concludes that the analysis and conclusions in the Assessment are accurate, supported, and based on best available science and methodology. GHD's peer review is based on the assumptions, operating restrictions, mitigation commitments, and verification measures documented in the June 29, 2026 Assessment. If the project design, equipment selection, operating assumptions, or mitigation measures materially change, the noise assessment should be updated or supplemented as appropriate.

Should you have any questions on the above, please do not hesitate to contact us.

Regards,

Sam East
Acoustics and Vibrations Professional

(519) 340-4426
Samuel.East@ghd.com

Michael Masschaele, LEL BES
Noise and Vibration Practice Leader – North America

(519) 340-3818
Michael.Masschaele@ghd.com