

GCEDC Comment Responses from Applicant

Comment Description	Comment #	Comment	Comment Response [GCEDC]
Project Description Comments			
Project Description	2.1	The Application states that a noise study is still underway. Accordingly, a noise study reflecting the complete design of Project Double Reed will be required in order to complete the review process. Please submit for review.	(II Project Description) (III-o Acoustics Technical Summary) Revised language has been added to the noted sections, reflecting the provided acoustics report.
Project Description	2.2	Application states tenant for the Project is a Fortune 50 company; conflicts with statement in § III-r (pg. 22) DAC Burden Report which states the tenant is a Fortune 500 company. Please clarify/confirm/correct this discrepancy.	(III-r Disadvantaged Communities (DAC) Burden Assessment) We have updated the section to resolve the discrepancy. We confirm that the project tenant is a Fortune 50 company.
Project Description	2.3	The Project Description recites that wetlands exist within Campus boundaries, however, neither the North Campus nor South Campus appear to contain either jurisdictional or non-jurisdictional wetlands. Please clarify/confirm/correct.	(II Project Description) Revised language has been added to clarify and confirm that no jurisdictional or non-jurisdictional wetlands exist within the proposed property boundaries; all such features are located entirely outside the project's work area and limit of disturbance.
Project Description	2.4	The description referring to the "requirements of the STAMP EIA" should be corrected to the STAMP GEIS. Please revise accordingly.	(III-o Acoustics Technical Summary) This reference has been revised in the Acoustics Technical Summary section of the report.
Project Description	2.5	Section discussing the Architectural Design of the Project should reference and discuss the Alabama Town Code Design Guidelines applicable to the Project and how the Project addresses same. Please revise accordingly.	(II. <i>Project Description, Architectural Design</i>) Reference to the Town of Alabama Technology District Standards and Guidelines (TDDSG) has been added to the architectural design description provided within the report. The TDDSG Checklist has been included as an appendix to the report.
Project Description	2.6a	Please provide detailed construction timeline, phases, and water usage during construction	(II Project Description) Additional discussion has been added under 'construction'
Project Description	2.6b	The description states that noise and dust mitigation measures have been proposed but same does not appear in plans or reports in the Application. Please provide detailed description of mitigation measures under separate section	(II Project Description) Dust is managed through routine watering of disturbed areas, limiting exposed soils, and enforcing low-speed limits for construction vehicles. Noise impacts are minimized by restricting work to approved daytime hours, properly maintaining equipment, and carefully scheduling higher-noise activities to reduce duration and off-site impacts.
Project Description	2.6c	Community Participation" subsection states that "the team has already identified multiple local programs for participation[.]" Please clarify and provide details on these programs and how they will address community participation.	(II Project Description) This section has been revised to include additional information on community support programs and participation.
Technical Summaries and Exhibits Comments			
Arch. Massing	3.A.1	Arch Massing and Elevations: Please provide a detailed analysis on how the Project design complies with the Town Code Design Guidelines.	(II. <i>Project Description, Architectural Design</i>) Reference to the Town of Alabama Technology District Standards and Guidelines (TDDSG) has been added to the architectural design description provided within the report. The TDDSG Checklist has been included as an appendix to the report.
Arch. Massing	3.A.2	Arch Massing and Elevations: Confirm final design elevations upon completion of noise study. The height of any screening on top of the buildings should be minimized based on the result of the noise study	(III-a. <i>Architectural Massing and Elevations</i>) Updated design elevations have been provided based on current design development and acoustic analysis results.

Visual Impact Analysis	3.B.1	Please provide additional visual simulations at the Tonawanda Seneca Nation border adjacent to the STAMP Site for both the North and South Campuses. Additional viewpoints should meet or exceed analysis completed for prior iteration of Project. Please ensure that the updated visual simulations reflect any changes in height/design based upon the pending noise study.	<i>(III-b. Architectural Massing and Elevations)</i> Refer to updated visual simulations based on the the latest architectural design development and screen wall heights, with additional viewpoints from the Tonawanda Seneca Nation border, approximate closest residence to the north and south of project and from eastern STAMP boundary (Alleghany Rd) to south Campus.
Visual Impact Analysis	3.B.2	Please provide visual simulations from the approximate closest residence to the Project (west of corner of Crosby and Lewiston Rd). Provide visual simulations from eastern STAMP boundary (Alleghany Rd) for south Campus.	<i>(III-b. Architectural Massing and Elevations)</i> Refer to updated visual simulations based on the latest architectural design development and screen wall heights, with additional viewpoints from the Tonawanda Seneca Nation border, approximate closest residence to the north and south of project and from eastern STAMP boundary (Alleghany Rd) to south Campus.
Visual Impact Analysis	3.B.3	Please ensure that all visual simulations include all proposed elements of Project, including electrical substation, landscaping, and any above-ground utilities.	<i>(III-b. Architectural Massing and Elevations)</i> Refer to updated visual simulations based on the latest architectural design development and screen wall heights, with additional viewpoints from the Tonawanda Seneca Nation border, approximate closest residence to the north and south of project and from eastern STAMP boundary (Alleghany Rd) to south Campus.
Site Plans	3.C.1	Electrical substation details should be provided. Please revise accordingly	<i>(III-i. Utility Power Technical Summary)</i> Additional description of the existing southern substation and required modifications has been provided.
Site Plans	3.C.2	Please provide utility plans for water, sewer, electrical, and other utilities.	<i>(III-c. Site Plans)</i> Utility Plans for water, sewer and stormwater have been added to the site plans.
Site Plans	3.C.3	Construction Logistics plans show temporary stormwater management facilities. Please provide additional detail on these facilities including but not limited to timing of use, design, construction and restoration plans following use.	<i>(III-c. Site Plans)</i> Please see updated construction logistics plans. Refer to section (III-d. Stormwater Technical Summary) for description of stormwater management for temporary laydown areas.
Stormwater	3.D.1	Stormwater considerations for temporary laydown area (30-acre lot, east of Crosby Rd and 10-acre lot north of south campus) should be included. Please provide.	<i>(III-c. Site Plans)</i> Please see updated construction logistics plans. Refer to section (III-d. Stormwater Technical Summary) for description of stormwater management for temporary laydown areas.
Stormwater	3.D.2	SWPPP should consider natural hydrology when considering pre and post-development runoff rates and volume. Please revise plans accordingly.	<i>(III-c. Site Plans)</i> Please see updated construction logistics plans. Refer to section (III-d. Stormwater Technical Summary) for description of stormwater management for temporary laydown areas. A SWPPP will be prepared for the project in accordance with SPDES General Permit for Stormwater Discharges from Construction Activity, GP-0-25-001, Construction General Permit and New York State Stormwater Design Manual.
Stormwater	3.D.3	Please provide details on the total acreage to be disturbed at one time. Disturbance greater than 5-acres will require a 5-acre waiver.	<i>(III-c. Site Plans)</i> Please see updated construction logistics plans. Refer to section (III-d. Stormwater Technical Summary) for description of stormwater management for temporary laydown areas. A SWPPP will be prepared for the project in accordance with SPDES General Permit for Stormwater Discharges from Construction Activity, GP-0-25-001, Construction General Permit and New York State Stormwater Design Manual.

Stormwater	3.D.4	On the North Campus, the conceptual temporary stormwater area at the laydown areas appears to be “uphill” from the laydown areas. Please clarify/confirm/correct. Currently, there is limited infrastructure in place to convey stormwater from the east side of Crosby Road with only minor roadside ditches and a 12” culvert under Crosby Road. Without significant improvements, the existing infrastructure appears inadequate to convey the stormwater management that is to be included as part of the temporary construction area. Please clarify/confirm/correct.	(III-c. Site Plans) Please see updated construction logistics plans. Refer to section (III-d. Stormwater Technical Summary) for description of stormwater management for temporary laydown areas. A SWPPP will be prepared for the project in accordance with SPDES General Permit for Stormwater Discharges from Construction Activity, GP-0-25-001, Construction General Permit and New York State Stormwater Design Manual.
Stormwater	3.D.5	There is no outfall noted for the stormwater basin proposed for the temporary construction area east of Crosby Road. Please clarify/confirm/correct.	(III-c. Site Plans) Please see updated construction logistics plans. Refer to section (III-d. Stormwater Technical Summary) for description of stormwater management for temporary laydown areas. A SWPPP will be prepared for the project in accordance with SPDES General Permit for Stormwater Discharges from Construction Activity, GP-0-25-001, Construction General Permit and New York State Stormwater Design Manual.
Stormwater	3.D.6	Conceptual site development plans must be provided which adequately describe construction storm-water management areas and post-construction stormwater management areas. Please clarify/confirm/correct.	(III-c. Site Plans) Please see updated construction logistics plans. Refer to section (III-d. Stormwater Technical Summary) for description of stormwater management for temporary laydown areas. A SWPPP will be prepared for the project in accordance with SPDES General Permit for Stormwater Discharges from Construction Activity, GP-0-25-001, Construction General Permit and New York State Stormwater Design Manual.
Stormwater	3.D.7	The provided stormwater management information does not discuss existing stormwater management already developed for the South Campus and how it will serve the proposed development. Please clarify/confirm/correct.	(III-c. Site Plans) Please see updated construction logistics plans. Refer to section (III-d. Stormwater Technical Summary) for description of stormwater management for temporary laydown areas. A SWPPP will be prepared for the project in accordance with SPDES General Permit for Stormwater Discharges from Construction Activity, GP-0-25-001, Construction General Permit and New York State Stormwater Design Manual.
Stormwater	3.D.8	Per the NYSDEC Stormwater Management Design Manual, the maximum allowable contributing runoff area for bioretention and open channel-type practices is 5 acres. The Campuses will likely need to be treated via Stormwater Treatment Ponds to achieve stormwater treatment requirements. Please clarify/confirm/correct.	(General Response) The proposed post-construction stormwater management practices (SMP's) have been designed in accordance with maximum contributory drainage areas permitted as defined in the 2024 New York State Stormwater Management Design Manual. (III-c. Site Plans) Please see updated construction logistics plans. Refer to section (III-d. Stormwater Technical Summary) for description of stormwater management for temporary laydown areas. A SWPPP will be prepared for the project in accordance with SPDES General Permit for Stormwater Discharges from Construction Activity, GP-0-25-001, Construction General Permit and New York State Stormwater Design Manual.

Stormwater	3.D.9	Preliminary stormwater treatment & storage design should be provided to ensure requirements can be met within the proposed Campus footprints. Please provide.	<p>(General Response)</p> <p>For the South Campus, the three (3) approved and constructed SMP's are being maintained and a fourth (a dry swale) is proposed and shown on the Bowman site plans to accommodate the design requirements. All SMP's are located within the proposed property.</p> <p>The North Campus will be provided with twelve (12) post-construction stormwater management practice facilities, which will meet the applicable design requirements and will also maintain the natural hydrology of the surrounding area. These proposed stormwater facilities include filtration bioretention facilities and a micropool extended detention pond. All of these SMP's are contained within the limits of the project site.</p> <p><i>(III-c. Site Plans)</i> Please see updated construction logistics plans. Refer to section <i>(III-d. Stormwater Technical Summary)</i> for description of stormwater management for temporary laydown areas. A SWPPP will be prepared for the project in accordance with SPDES General Permit for Stormwater Discharges from Construction Activity, GP-0-25-001, Construction General Permit and New York State Stormwater Design</p>
Stormwater	3.D.10	Currently, only a relatively minor and undefined drainage channel exists at the location of the Northern Campus to carry runoff from the site's stormwater facilities. Stormwater management practices associated with the Project would likely result in a considerable increase in flows being directed to this channel. Further considerations should be taken into account into downstream improvements that may be necessary to properly convey the runoff from both sites. Please clarify/confirm/correct.	<p>(General Response)</p> <p>The existing North Campus site drains to four (4) different points which are as follows:</p> <ul style="list-style-type: none"> a) POA #1 Northwest portion of the site to a swale that extends in a northwesterly direction toward the STAMP sub-station b) POA #2 Northwest portion of site, west of proposed BUFA Stream sub-station to a swale that extends to the west c) POA #3 Western portion of the site which drains to W10 and then continues in a westerly direction via Tributary 2 (see STAMP Delineated Wetlands & Streams mapping) d) POA #4 Southwest corner of the site which drains to a swale that connects with Tributary 10 downstream of W10 <p>In accordance with requirements of the SPDES General Permit for Stormwater Discharges from Construction Activity, the post-development stormwater design provides water quality treatment, runoff reduction, attenuation of larger storm events and erosion and sediment controls at the four locations stormwater discharges from the project site.</p> <p><i>(III-c. Site Plans)</i> Please see updated construction logistics plans. Refer to section <i>(III-d. Stormwater Technical Summary)</i> for description of stormwater management for temporary laydown areas. A SWPPP will be prepared for the project in accordance with SPDES General Permit for Stormwater Discharges from Construction Activity, GP-0-25-001, Construction General Permit and New York State Stormwater Design Manual.</p>

Stormwater	3.D.11	<p>Please note that NYSDEC has requested that we relay that, consistent with General Permit for Stormwater Discharges from Construction Activities, Part II.B.2.e.iii, the project SWPPP must include a hydrologic analysis that compares pre- and post-development runoff rates and volumes for the different design storm events. This comparison is done for each designed discharge point. These may include streams, stormwater conveyances, wetlands, or ponds but sometimes also include smaller features such as vernal pools and isolated wetlands. As per the 2024 Stormwater Management Design Manual Chapter 3, one goal of the stormwater management is to maintain natural hydrology to, and preserve the ecological function of, natural resources. During NYSDEC's review of project SWPPPs NYSDEC staff will be looking to see that new projects identify all nearby natural resources outside the limits of disturbance and that the site design preserves the natural hydrology and surface water flows to these features to the maximum extent possible.</p>	<p>(General Response) Noted. A SWPPP will be prepared for the project in accordance with SPDES General Permit for Stormwater Discharges from Construction Activity, GP-0-25-001, Construction General Permit and New York State Stormwater Design Manual.</p>
Stormwater	3.D.12	<p>The Tonawanda Seneca Nation has previously expressed concern that development of the Project could result in downstream impacts to the Nation's Territory. In preparing the above revisions, please ensure that sufficient information and design criteria are detailed to demonstrate no adverse impact to the Nation's Territory or downstream/downgrade resources generally.</p>	<p>(General Response) Noted. A SWPPP will be prepared for the project in accordance with SPDES General Permit for Stormwater Discharges from Construction Activity, GP-0-25-001, Construction General Permit and New York State Stormwater Design Manual. The SWPPP and Stormwater Design Reports for both the South and North Campuses will thoroughly document compliance with the applicable State Design Manual for water quality and runoff reductions. To re-iterate, the South Campus maintains the approved and constructed SMP's for that property with the addition of a dry swale. The North Campus SWM design maintains the natural hydrology to four existing discharge locations and therefore maintains the hydrology of each subwatershed and the downstream areas without burdening these areas as a result of the creation of the impervious areas.</p>

<p style="text-align: center;">Photometric</p>	<p style="text-align: center;">3.F.1</p>	<p>Please provide narrative explaining lighting plan, location, heights, dark sky compliance/shielding, and any other relevant details.</p>	<p>(III-f Photometric Plan)</p> <p>Refer to updated photometrics plan.</p> <p>All new light fixtures will be focused with Dark Sky Ordinance compliant installation in a horizontal position to prevent upward reflection or glow to night skies and reduce the amount of light illumination beyond the property boundary. Light fixtures and lighting controls compliant with New York Energy Code will be installed on both the north and south campus of the Stream BUFA campus. Light fixtures proposed to be installed on the campus are all proposed to be new LED fixtures inclusive of:</p> <p>Type S1 - 25ft tall LED pole lights with standard Type III distribution installed along roadways. International Dark Sky (IDA) Fixture Seal of Approval Available.</p> <p>Type FE - LED Wallpacks installed on building facade over loading dock doors.</p> <p>Type ST – LED yoke-mounted flood lights with wide throw distribution installed 25ft high on poles and aimed inwards towards substation transformers.</p> <p>Based upon the proposed lighting plans, the BUFA campus is averaging 2fc along roadways, 3fc at loading docks, and 2.5fc at both the new and existing substations. No illuminance is found along most of the Stream campus property line with roadway entrances/exits experiencing up to 0.6fc from new roadway lighting at the property line, providing visibility and safety for entering/exiting and passing vehicles.</p>
--	---	---	---

<p style="text-align: center;">Photometric</p>	<p style="text-align: center;">3.F.2</p>	<p>Locations on the provided maps show lighting impacts migrating off-site on North Campus in areas other than vehicle access. Please clarify the extent and cause of these impacts and reduce as appropriate.</p>	<p>(III-f Photometric Plan)</p> <p>Refer to updated photometrics plan.</p> <p>All new light fixtures will be focused with Dark Sky Ordinance compliant installation in a horizontal position to prevent upward reflection or glow to night skies and reduce the amount of light illumination beyond the property boundary. Light fixtures and lighting controls compliant with New York Energy Code will be installed on both the north and south campus of the Stream BUFA campus. Light fixtures proposed to be installed on the campus are all proposed to be new LED fixtures inclusive of:</p> <p>Type S1 - 25ft tall LED pole lights with standard Type III distribution installed along roadways. International Dark Sky (IDA) Fixture Seal of Approval Available.</p> <p>Type FE - LED Wallpacks installed on building facade over loading dock doors.</p> <p>Type ST - LED yoke-mounted flood lights with wide throw distribution installed 25ft high on poles and aimed inwards towards substation transformers.</p> <p>Based upon the proposed lighting plans, the BUFA campus is averaging 2fc along roadways, 3fc at loading docks, and 2.5fc at both the new and existing substations. No illuminance is found along most of the Stream campus property line with roadway entrances/exits experiencing up to 0.6fc from new roadway lighting at the property line, providing visibility and safety for entering/exiting and passing vehicles.</p>
--	---	--	---

Photometric	3.F.3	No lights are included in proposed substation area. Please confirm whether any illumination (including temporary or timed lights) is proposed for substation area.	<p>(III-f Photometric Plan)</p> <p>Refer to updated photometrics plan.</p> <p>All new light fixtures will be focused with Dark Sky Ordinance compliant installation in a horizontal position to prevent upward reflection or glow to night skies and reduce the amount of light illumination beyond the property boundary. Light fixtures and lighting controls compliant with New York Energy Code will be installed on both the north and south campus of the Stream BUFA campus. Light fixtures proposed to be installed on the campus are all proposed to be new LED fixtures inclusive of:</p> <p>Type S1 - 25ft tall LED pole lights with standard Type III distribution installed along roadways. International Dark Sky (IDA) Fixture Seal of Approval Available.</p> <p>Type FE - LED Wallpacks installed on building facade over loading dock doors.</p> <p>Type ST - LED yoke-mounted flood lights with wide throw distribution installed 25ft high on poles and aimed inwards towards substation transformers.</p> <p>Based upon the proposed lighting plans, the BUFA campus is averaging 2fc along roadways, 3fc at loading docks, and 2.5fc at both the new and existing substations. No illuminance is found along most of the Stream campus property line with roadway entrances/exits experiencing up to 0.6fc from new roadway lighting at the property line, providing visibility and safety for entering/exiting and passing vehicles.</p>
Landscape Plan	3.G.1	Additional details (e.g., species and number of plantings) should be provided.	<p>(Exhibit - Landscape Plan)</p> <p>This exhibit has been updated. Note the project prioritizes an integrated approach and incorporates native and adapted plants.</p>
Landscape Plan	3.G.2	When designing planting plans, native species should be given high consideration, especially for any areas in proximity to wetlands.	<p>(II Project Description)</p> <p>Note that under 'Architectural Design' the intent of the project is to prioritize an integrated approach and incorporate native and adapted plants.</p>
Landscape Plan	3.G.3	Climate resiliency should be taken into consideration to ensure long-term survival of any planted tree species.	<p>(II Project Description)</p> <p>Note that under 'Architectural Design' the intent of the project is to prioritize an integrated approach and incorporate native and adapted plants.</p>
Landscape Plan	3.G.4	The eastern end of the South Campus lies between jurisdictional wetlands along both the northern and southern boundaries of the property. The buffers along these wetlands should be maintained as natural habitat as much as possible, with minimal management. Please clarify/confirm/correct.	<p>(General Response)</p> <p>Noted - These areas will be maintained to the greatest extent practicable.</p>
Landscape Plan	3.G.5	The southwestern border of the North Campus does not currently include any landscaping. Please add landscaping elements to Project, or advise as to reason for exclusion.	<p>(Exhibit - Landscape Plan)</p> <p>This exhibit has been updated to include additional landscaping elements.</p>

Traffic Summary	3.H.1	Please provide more details regarding vehicle types for delivery traffic (box, tractor trailer, etc.).	(General Response) Based on other US data center campuses operated by Stream, the type of trucks delivering to the campus will be Tractor Trailers (WB-67) and make roughly 6-8 deliveries within a 24 hr period.
Traffic Summary	3.H.2	Please provide number and types of trips associated with construction traffic (workers onsite, truck traffic/type) throughout all planned construction on both Campuses.	(General Response) We anticipate 800 – 1000 employee vehicles and 100 – 200 delivery trucks daily at the peak of construction. The project phases are anticipated to be spaced out such that the points of peak construction do not overlap between phases.
Traffic Summary	3.H.3	Plans currently propose the closure of Crosby Road during construction operations. This requires additional analysis, including impacts to alternate corridors with Edwards Vacuum operational. Please clarify/confirm/correct.	(General Response) During construction, temporary traffic management of Crosby Road may be required. The anticipated impact on the overall traffic network is expected to be minimal. All traffic management and temporary traffic control measures, including advance warning signage and the use of trained flaggers to control traffic during deliveries and other construction activities, will be implemented to maintain safe traffic operations for local motorists.
Utility Power	3.I.1	Please provide detail on the new proposed substations for the Project.	<i>(III-i. Utility Power Technical Summary)</i> Additional description of the existing southern substation and required modifications has been provided.
Utility Power Infra.	3.J.1	See above comment	<i>(III-i. Utility Power Technical Summary)</i> Additional description of the existing southern substation and required modifications has been provided.
Backup Power	3.K.1	Please provide detailed description of secondary containment design for generator fuel storage together with all other spill prevention protocols/plans and design features.	<i>(III-i. Utility Power Technical Summary)</i> additional narrative of secondary containment and compliance with SPPC rule have been added.
Backup Power	3.K.2	Please identify state and federal petroleum storage regulations applicable to the Project and how the Project design and/or operation incorporates or adheres to these requirements (e.g., petroleum bulk storage registration).	<i>(III-i. Utility Power Technical Summary)</i> additional narrative of secondary containment and compliance with SPPC rule have been added.
Geotech	3.L.1	Please provide results of additional geotechnical analysis.	(III-l Geotechnical Summary) The Geotechnical Summary has been updated to include additional geotechnical analysis from 2017 and 2021 reports.
Air Emissions	3.N.1	Please provide analysis of emissions relative to GEIS thresholds.	(III-ln Air Emissions Technical Summary) The Air Emissions Technical Summary has been updated to include analysis of emissions relative to GEIS thresholds.
Air Emissions	3.N.2	Please note, the GCEDC may retain a separate Air Emissions consultant to fully review air emission materials. Thus, more comments may be forthcoming.	(General Response) Noted.
Acoustics	3.O.1.A	The pending noise study should include modeling that captures the following at all frequency levels: Ambient noise at receptors as detailed in GEIS.	(Exhibit - Acoustics Report) Report has been provided with analysis of ambient noise on modeled compliance.
Acoustics	3.O.1.B	The pending noise study should include modeling that captures the following at all frequency levels: Cumulative noise impacts from all STAMP noise sources at receptors.	(Exhibit - Acoustics Report) Report has included modeling results for sound levels at the project boundary and proximate noise sensitive areas, including residential receptors to the north and south and the Tonawanda Seneca Nation Boundary.

Acoustics	3.O.1.C	Noise impacts at the STAMP boundary with residential receptors, near wildlife areas, and at Tonawanda Seneca Nation boarder for both campuses.	(Exhibit - Acoustics Report) Report has included modeling results for sound levels at the project boundary and proximate noise sensitive areas, including residential receptors to the north and south and the Tonawanda Seneca Nation Boundary.
Acoustics	3.O.2	The noise emitting equipment should be explained in more detail (e.g., chillers/generator spec sheets). Please clarify/confirm/correct.	(III-o. Acoustics Technical Summary) Refer to acoustics report for description of noise emitting equipment. Equipment source sound levels are provided based on expected equipment selection. Equipment selections will meet the performance requirements stated within the acoustic report.
Acoustics	3.O.3	Noise modeling should include all operational acoustic profiles detailed in Application measured to both the Campuses' property lines, the STAMP borders (including the STAMP border with the Tonawanda Seneca Nation) and all sensitive receptors identified in the Application. Please clarify/confirm/correct.	(Exhibit - Acoustics Report) Report has included modeling results for sound levels at the project boundary and proximate noise sensitive areas, including residential receptors to the north and south and the Tonawanda Seneca Nation Boundary.
Acoustics	3.O.4	As mitigation measures are identified and implemented into Project design, all Application materials must be updated to reflect final Project design.	(Exhibit - Acoustics Report) Project design mitigation measures outlined in the report have been integrated into all application and design materials.
Emergency Services	3.P.1.A	Please provide additional detail regarding outreach efforts including: when outreach to each of these agencies occurred and documentation of their feedback where possible.	(III-p Emergency Services Confirmation Technical Summary) Emergency Services Confirmation Technical Summary provides detail on outreach efforts and documentation of discussions.
Emergency Services	3.P.1.B	Please provide additional detail regarding outreach efforts including: Information on what Project details were provided which formed the basis of the determinations from these agencies that the Project will have no impacts on levels of emergency services.	(III-p Emergency Services Confirmation Technical Summary) Emergency Services Confirmation Technical Summary provides detail on outreach efforts and documentation of discussions.
Emergency Services	3.P.1.C	Please provide additional detail regarding outreach efforts including: information on specific hazard concerns of data centers and specifically related to this Project.	(III-p Emergency Services Confirmation Technical Summary) Emergency Services Confirmation Technical Summary provides detail on specific hazard concerns of data centers and those specifically related to the project design criteria.
Emergency Services	3.P.2	Please provide description of the upgraded fire-fighting abilities of the Alabama Volunteer Fire Department specifically for STAMP.	(III-p Emergency Services Confirmation Technical Summary) Emergency Services Confirmation Technical Summary provides understanding of upgraded fire fighting abilities, specifically the ability of foam capability.
Emergency Services	3.P.3	Note: GEIS Findings Statement § 6.10.2 requires a facility specific emergency services impact study be prepared and submitted to an informal committee of local and county emergency response representatives. Please clarify/confirm/correct.	(General Response) Stream Data Centers confirms that while the formal site-specific Emergency Action Plan will be finalized upon completion of final design and engineering, the emergency response and services technical summaries provided as part of this SEQR review confirm the project's minimal impact on local resources. These summaries detail our robust training protocols, specialized design criteria—including redundant secondary containment and non-chemical fire suppression—and 24/7 on-site expert staffing that ensure a low-risk operational environment.
Emergency Response Procedures	3.Q.1	This section should be relabeled § III-q.	(III-q Emergency Response Procedures Technical Summary) Section has been updated to reflect correct sequence.
Emergency Response Procedures	3.Q.2	Stream's "rigorous emergency Response Protocols" are referenced in this section but they do not appear to be provided. Please clarify/confirm/correct.	(III-q Emergency Response Procedures Technical Summary) Section has been updated to incorporate the Framework and Site-Specific Governance information related to Stream's Emergency Action Plans.

Emergency Response Procedures	3.Q.3	Update with details on emergency response protocols and preferably a document prepared specifically for the Project.	(III-q Emergency Response Procedures Technical Summary) As the site is currently undergoing design and engineering development, a site-specific EAP will be prepared upon conclusion of that phase to account for specific design and operational considerations. TAn Emergency Action Plan (EAP) for a data centers provide a rigorous framework for life safety and asset protection, detailing specific response protocols for fire suppression discharge, arc flash incidents, medical emergencies, and hazardous material leaks to minimize personnel risk and facility downtime.
Emergency Response Procedures	3.Q.4	Please provide information on the UPS batteries, their hazards, and how the hazards are mitigated through Stream’s emergency protocols and plans.	(III-q Emergency Response Procedures Technical Summary) Section has been updated to incorporate hazard and mitigation associated with UPS batteries.
Emergency Response Procedures	3.Q.5.A	Please provide specific information on the fuel storage and spill preparedness including: Details and design of the secondary containment	(III-q Emergency Response Procedures Technical Summary) Section has been updated to incorporate additional information regarding secondary containment, protection, and preparedness protocols.
Emergency Response Procedures	3.Q.5.B	Please provide specific information on the fuel storage and spill preparedness including: Applicable state and federal petroleum storage regulations that are being complied with.	(III-q Emergency Response Procedures Technical Summary) Section has been updated to incorporate additional information regarding secondary containment, protection, and preparedness protocols as well as regulatory compliance.
Emergency Response Procedures	3.Q.6	Please provide details on employee emergency training.	(III-q Emergency Response Procedures Technical Summary) Section has been updated to incorporate the Framework and Site-Specific Governance information related to Stream's Emergency Action Plans.
Disadvantaged Communities	3.R.1.A	While the DACs at issue do not appear to suffer air pollutant and water pollutant burdens, these issues should be specifically addressed considering they were previously raised as a significant concern by the Tonawanda Seneca Nation regarding: Air pollutants	(Exhibit - Disadvantaged Communities Burden Analysis) 5.0 Narrative includes additional analysis regarding air pollution.
Disadvantaged Communities	3.R.1.B	While the DACs at issue do not appear to suffer air pollutant and water pollutant burdens, these issues should be specifically addressed considering they were previously raised as a significant concern by the Tonawanda Seneca Nation regarding: Pollutants to Oak Orchard Creek and Tonawanda Seneca Nation drinking water. Please note that it is our understanding, after discussions with NYSDEC, that onsite stormwater does not drain into the Oak Orchard Creek watershed.	(Exhibit - Disadvantaged Communities Burden Analysis) 5.0 Narrative includes additional analysis regarding air pollution as well as analysis of pollutants to Oak Orchard Creek and Tonawanda Creek.
Disadvantaged Communities	3.R.2	Pg. 4 of the DAC assessment states that the Project will consist of developing a data center “on a total of 130-acres”. Please correct to explain the data center will occupy 90 acres with 40 acres of STAMP land temporarily utilized for construction logistics areas. Also correct assertion that Project will be permanently located on both sides of Crosby Road	(Exhibit - Disadvantaged Communities Burden Analysis) 3.1 Overview description has been changed to clarify the permanent and temporary acreage of the project.
Disadvantaged Communities	3.R.3	On Pg. 5, clarify whether there will be “three stormwater management areas” in total or three for each Campus (North & South). Provide details on the discharge of these stormwater management areas: volume, quality, and receiving waters impacts.	(Exhibit - Disadvantaged Communities Burden Analysis) 5.0 Narrative has been updated with description of proposed stormwater management areas.
Disadvantaged Communities	3.R.4	On Pg. 7, relate the current Project’s pricing/economic impacts to STAMP once such information is available.	(General Response) Project’s economic impacts will be outlined in detail under separate application cover.
Disadvantaged Communities	3.R.5	On Pg. 10, please note, in past communications with the Tonawanda Seneca Nation, the Nation does not characterize itself as “disadvantaged” but has acknowledged that the term is used in reference to the Environmental Justice Site Law.	(Exhibit - Disadvantaged Communities Burden Analysis) 4.1 Spatial Data has been revised with a note acknowledging this understanding.

Disadvantaged Communities	3.R.6	On Pg. 14, there does not appear to be specific discussion regarding the Tonawanda Seneca Nation or Town DAC tracts in this section, which should be revised to include same. Explain traffic route of expected traffic from the Project in more detail and provide map or other figures.	(Exhibit - Disadvantaged Communities Burden Analysis) Report includes note regarding route of expected traffic as well as Figure (#41) which outlines the anticipated route. Both Tonawanda Seneca Nation and Census Tract 36037940100 have been noted as part of analysis.
Disadvantaged Communities	3.R.7	On Pg. 15, provide the expected impacts in acres to agricultural fields under the STAMP GEIS and compare with existing and proposed impacts under the Project.	(Exhibit - Disadvantaged Communities Burden Analysis) Report includes expected impacts to agricultural fields under STAMP GEIS.
Disadvantaged Communities	3.R.8	On Pg 15-19 re emergency services, additional information on emergency response plans should be updated per any updates to those sections above.	(Exhibit - Disadvantaged Communities Burden Analysis) Report includes additional information on emergency services preparedness plans.
Disadvantaged Communities	3.R.9	On Pg. 20, the acoustic impacts section should be updated upon receipt of a final noise study	(Exhibit - Disadvantaged Communities Burden Analysis) Report includes analysis from the completed noise modeling done for the project.
Disadvantaged Communities	3.R.10	On Pg. 22, confirm whether the tenant is a fortune 500 or 50 company.	(Exhibit - Disadvantaged Communities Burden Analysis) Report has been revised to correct typo; the tenant is a Fortune 50 company.
LEAF Part 1 Form			
Potable Water Infrastructure	D.2.1.A	c.i. Long Environmental Assessment Form (LEAF) indicates daily usage of 20,000 gallons per day from STAMP Water Works. Identify water usage in the report and provide calculation backup for estimated water usage.	(EAF - D.2. Project Operation - c.i.) Refer to engineer's report provided as an exhibit for calculation backup for estimated water usage.
Sanitary Sewer Infrastructure	1.A	. d.i. LEAF indicates daily sanitary discharge of 20,000 gallons per day to the onsite sanitary sewer system. Discharge to V. Oakfield WWTF by STAMP Force Main. There is no mention of improvements required at the Oakfield WWTF. Identify sewer usage in the report and provide calculation backup for estimated sewer usage.	(EAF - D.2. Project Operation - d.i.) Refer to engineer's report provided as an exhibit for calculation backup for estimated sewer discharge.
Sanitary Sewer Infrastructure	1.B	. d.i. LEAF indicates daily sanitary discharge of 20,000 gallons per day to the onsite sanitary sewer system. Discharge to V. Oakfield WWTF by STAMP Force Main. There is no mention of improvements required at the Oakfield WWTF. - Onsite sanitary sewer needs. Grades decrease from Crosby Road west. Onsite pump station, owned by Stream maybe needed. Please clarify/confirm/correct.	(EAF - D.2. Project Operation - d.i.) Correct, an on-site sanitary lift station will be required to discharge sanitary from North site to the STAMP sanitary sewer.
Sanitary Sewer Infrastructure	1.C	. d.i. LEAF indicates daily sanitary discharge of 20,000 gallons per day to the onsite sanitary sewer system. Discharge to V. Oakfield WWTF by STAMP Force Main. There is no mention of improvements required at the Oakfield WWTF. - . Identify sanitary sewage makeup.	(EAF - D.2. Project Operation - d.ii.) Nature of liquid waste is stated in section D.2. Project Operation - d.ii. discharge will be sanitary wastewater, i.e. domestic waste.
Site and Setting of Proposed Action	E.1	Clarify required construction worker parking. (30-acre lot, east of Crosby Rd and 10-acre lot north of south campus)	(Exhibit - Construction Logistics) Revised exhibit illustrates additional detail for the 30-acre and 10-acre lots considered for this purpose, including approximate parking counts.
Site and Setting of Proposed Action	E.2	Access to north campus off STAMP Substation "driveway." How will access be handled?	(General Response) The project intends to secure a formal access easement for the existing substation road and, under that agreement, will be responsible for the design, funding, and construction of all necessary improvements to ensure the roadway meets both project specifications and local jurisdictional standards.

Site and Setting of Proposed Action	E.3	3. How will the “Temporary Project Areas” be graded to support construction operations? How will they be restored?	(General Response) The temporary areas will contain a gravel surface and upon completion, the gravel will be removed, the underlying soils will be scarified, topsoil placed and the entire area seeded and mulched. Erosion control measures will remain in place until the area is restored.
Site and Setting of Proposed Action	E.4	Geotechnical discussion mentions the soils are “favorable” for the proposed development. To what extent will the site be graded? Conceptual cut/fill volumes? Where will any unsuitable, or excess soils be hauled to or stockpiled?	(General Response) The south site is already graded and will require approximately 70,000 cubic yards of imported material consisting of select fill, gravel, asphalt pavement and concrete. The North Campus has greater topographic elevational changes across the proposed development area. There will generally be a cut of the existing grades along the Crosby Road frontage with the two building pads generally being located in fill. Embankment slopes are anticipated along the southern and western portions of the site. The proposed design requires approximately 31,000 CY of cut and 354,000 CY of fill for a net import of 323,000 CY of import consisting of select fill, gravel, asphalt pavement and concrete slabs.
Site and Setting of Proposed Action	E.5	Phasing – indication of what is constructed first and time in between. EAF says no phasing, confirm concurrent construction.	(General Response) The form has been updated to account for and describe the expected sequencing of construction.
Site and Setting of Proposed Action	E.6	Initial worker count was noted at 120 employees, yet the conceptual parking count appears to be 282. What is the rationale behind having more than double the parking spots required to accommodate employees?	(General Response) The parking count reflects a total distribution of 60–65 spaces per building to accommodate not only the 120 employees but also vendors, maintenance personnel, shift overlaps, and visitors. Additionally, the plan includes 5–7 public spaces near security checkpoints to ensure site safety and operational flexibility.
Natural Resources on or Near Project Site- Wetlands	E.2.1	As detailed above, consider existing hydrology, feeding existing drainage ways and wetlands offsite.	(General Response) - All jurisdictional and non-jurisdictional wetlands are located outside the main proposed project boundaries.
Natural Resources on or Near Project Site- Wetlands	E.2.2	a. depth to bedrock is much greater than 6’. Review boring logs.	(General Response) Depth to bedrock revised to >30ft.
Natural Resources on or Near Project Site- Wetlands	E.2.3	h.iv. Describe streams/ tribs consistent with the wetland/ stream delineation for the STAMP site. Note any potential offsite steam/ wetland impacts from regrading of the project site. The site plan needs to be clear whether there will be any impacts to Wetland 20, and if so, these impacts must be permitted. Any riprap installed for the outfall of the stormwater pond must remain outside of the delineated wetland boundary or a permit must be acquired for the addition of fill into the wetland.	(General Response) The project team acknowledges the presence of Wetland 20 as identified in the STAMP site delineation. However, the South Campus development will not result in any impacts to this area. The site design specifically leverages existing, permitted, and fully developed stormwater facilities and their associated outfalls. Consequently, the project requires no new outfalls or improvements—such as the placement of riprap—within the wetland or its adjacent areas. Because there is no proposed filling or regrading within these boundaries, the project avoids any disturbance to Wetland 20, and no additional wetland permitting is required for this scope of work.

<p>Natural Resources - T&E</p>	<p>E.2.1</p>	<p>The species listed in E.2.m, E.2.o, and E.2.p are pulled from the STAMP DGEIS without taking the specific project site into consideration. It also does not take into consideration federally listed species. Threatened and endangered species should include: short-eared owl, northern harrier, bald eagle, and northern long eared bat. Tricolored bat should also be included, as it has been proposed for federal listing as endangered and has been known to occur within the area. The same applies for the monarch butterfly, which has been proposed for federal listing as threatened, although the proposed 4(d) rule likely makes this project exempt from possible monarch restrictions.</p>	<p>(General Response)</p> <p>In response to comments regarding listed species, the project team has reconciled regional DGEIS data with site-specific findings, including the 2011 Earth Dimensions investigation and a field review by Jacobs in November 2025. While potential habitat for the short-eared owl and northern harrier exists, field surveys confirmed that the project parcel lacks the dense woods or large water bodies required by the bald eagle, northern long-eared bat, and tricolored bat. Primary habitat for these species remains in the wooded areas to the west of the site.</p> <p>The documented presence of the northern harrier previously triggered an Incidental Take Permit for the STAMP site. Consequently, the GCEDC developed a Net Conservation Benefit Plan that provides permanent protection and restoration of suitable winter raptor habitat under NYSDEC oversight. The proposed Data Centers fall within the scope of this existing permit and plan, proposing no modifications or expansions to these protections. Additionally, the Data Centers will not directly impact surface waters or associated habitats due to strict stormwater controls and regulatory compliance.</p> <p>Finally, while the monarch butterfly is proposed for federal listing, the project's impact is considered negligible as significant habitat remains nearby and the proposed federal 4(d) rule is expected to exempt such developments. Overall, by adhering to the established Net Conservation Benefit Plan and existing regulatory requirements, the project ensures that the development of the facility will not be detrimental to state or federally listed species.</p>
<p>Natural Resources - T&E</p>	<p>E.2.2</p>	<p>Rare species that should be listed in E.2.p should be horned lark, sharp-shinned hawk, and Cooper's hawk.</p>	<p>(General Response)</p> <p>Acknowledged and updated on Part 1 Form.</p>

Natural Resources - T&E	E.2.3	<p>Question E.2.q should detail the distance between both Campuses and the Tonawanda Seneca Nation's territory and whether operations from Project Double Reed is anticipated to have any impact on wildlife on the Tonawanda Seneca Nation with explanation/analysis relative to same.</p>	<p>(General Response)</p> <p>The project is not anticipated to have an adverse impact on wildlife within the Tonawanda Seneca Nation territory due to the physical separation between the project sites and the Nation's land, the implementation of environmental design controls, and the existing industrial and agricultural character of the landscape.</p> <p>The North Campus is located approximately 3,500 feet (0.66 miles) from the territory boundary, while the South Campus is situated approximately 2,000 feet (0.38 miles) away. It is important to note that the STAMP site is already characterized by significant human-made disturbances and prior development, including:</p> <ul style="list-style-type: none"> - Industrial Footprints: Active development by Plug Power and the Edwards Vacuum facilities. - Infrastructure: Established roadways and utility corridors serving the site. - Historical Land Use: Long-standing agricultural development and the presence of residential properties and associated activity. <p>To mitigate potential additional disturbances to local fauna, project operations adhere to the acoustic thresholds established in the STAMP DGEIS and Findings, which limit sound levels to 65 dBA during the day and 45 dBA at night. Furthermore, the project will incorporate Dark Sky compliant lighting to eliminate upward light scatter and prevent the disorientation of nocturnal species. To protect migratory and resident bird populations, the facilities will utilize bird-safe glazing to significantly reduce the risk of avian strikes.</p>
Designated Public Resources- Archeological Resources	E.3.1	<p>Subsection g.i. - the portion of the North Campus that is currently privately owned will need an archeological review completed in coordination with the New York State Office of Parks, Recreation and Historic Preservation.</p>	<p>(General Response)</p> <p>Acknowledged. An archeological review is being coordinated with the private landowner and the New York State Office of Parks, Recreation and Historic Preservation.</p>
Agricultural Resources	E.3.1	<p>The STAMP Site is not located in an Agricultural District, please revise accordingly</p>	<p>(General Response)</p> <p>Acknowledged and updated on Part 1 Form.</p>