STREAM DATA CENTERS

April 06, 2026 | 2nd Round - GCEDC Comment Responses from Applicant

Comment Description	Comment #	Comment	Comment Response
Project Description Comments			
Project Description	**2.1**	The Project Description section regarding Economic Impact and Job Creation, as well as the section discussing Water Efficiency and Conservation each state that the Project will be staffed by 125 permanent employees. Additionally, the Financial Incentives Application also identifies that the Project will employ 125 full-time employees. The Engineer Reports accompanying the Project site plan ("Site Plans") submissions to the Town of Alabama Planning Board ("Planning Board") dated January 9, 2026 for the South Campus and January 23, 2026 for the North Campus (collectively, the "Engineer Reports") state that each of the three data center buildings will be staffed by an average of 30 employees per shift, with three shifts per day. If accurate, this would be approximately 270 employees, exceeding the 125 full time employees estimated for the Project in the Project Description. Please clarify or correct all documentation to reflect the total number of employees that are proposed to staff the Project, including non-full-time employees or independent contractors. All application materials to the GCEDC and the Town must be consistent.	**[II | Project Description]** The relevant project description areas have been revised for consistency. Further, additional clarity regarding water and wastewater calculations have been included. See attached Engineers report Dated April 3, 2026. Additionally, the 125 permanent employees reflect long-term roles. These include positions such as data center technicians, administrative staff, IT support, security and management. These employees are spread across various tasks and departments, ensuring the continuous long-term operation of all three buildings. However, beyond these three shift-based staff, there are occasional temporary increases, for example; construction phases, maintenance teams, special projects can increase temporary headcounts. From an engineering perspective, an average of 30 employees per shift is used for determining maximum daily water and wastewater for each building. Thus, while the average employees per shift may suggest a higher employee count this is used for worst-case engineering design parameter, and the permanent employee stated reflects the steady overall workforce.
Project Description	**2.2**	The Project Description discusses the telecommunication networking infrastructure ("Telecom Infrastructure") to be installed adjacent to Crosby Road between the North and South Campus. The associated "Telecom Exhibit" indicates the location and installation of the Telecom Infrastructure has not been finalized but will cross three wetland areas not previously accounted for in the SEQRA documentation for the Project • The duct bank will cross wetland 34 and 36, Trib 5 and Trib 3. This will require horizontal directional drilling ("HDD") techniques. Provide detail for the duct bank section and installation methods to avoid wetland disturbance, including confirmation that HDD is viable in these locations. • What is the space required for this duct bank? Is it proposed to be outside of the existing road right-of-way in a permanent easement? If so, please provide details on the area of easement required. • Duct bank north of Trib 3 crossing, on the east side of the road appears to be located within property owned by Edwards Vacuum. Confirm whether the duct bank will be located within the road right of way or whether private easements will be secured for the installation of the duct banks.	**[II | Project Description]** The telecom alignment between the North and South campuses has been refined and will be located along the West side of Crosby Rd. The alignment will not extend onto the property owned by Edwards Vacuum. The project includes two parallel telecom duct bank pathways with a minimum 25-foot separation between pathways for redundancy. Based on this configuration, each duck bank will have an approximate cross-sectional envelope of 9-feet wide by 9-feet depth. With final dimensions to be confirmed during detailed design. To avoid and minimize impacts to Tributary 5 and Tributary 3, the project proposes crossings will be completed directional drilling. HDD will be designed to pass beneath the wetland and tributary features with sufficient depth to avoid surface disturbance, consistent with the standard engineering practice for trenchless installation. See 'Environmental Management' narrative for additional information regarding proposed construction and mitigation processes. All work will be performed in accordance with applicable New York State regulatory requirements and engineering standards. The telecom infrastructure will be located outside of the existing public road right-of-way. A permanent private utility easement will be established with the property owner county development entity to accommodate the installation. Based on the proposed configuration of two duck banks and the required separation, the permanent easement width will be approximately 75 to 100 feet with additional temporary easements areas you utilized as needed during construction.

Project Description	**2.3**	The Project Description section describing Water Efficiency and Conservation states that water and wastewater usage is 20,000 gallons per day ("gpd"). This is inconsistent with the 12,500 gpd estimate for wastewater provided in the Environmental Assessment Form ("EAF"), as well as the approximately 19,710 gpd of water demand and 9,450 gpd of wastewater provided for the Project in the Engineer Reports. Please revise and clarify accordingly. In addition, there is no detail provided about water demand during construction. Please revise the Engineer Reports to add details regarding same for each phase of construction.	[II | Project Description] The relevant project description areas have been revised for consistency. Further, additional clarity regarding water and wastewater calculations have been added, including expected construction water usage. See Construction narrative of Project Description for additional information.
Project Description	**2.4**	In the Project Description section discussing the Architectural Design of the Project--the building and screening heights given in this section appear to be contradicted by the Elevations, Site Plans, Noise Study, and EAF in the Updated Application, with given building heights ranging from 46-56 ft. and top of screening ranging from 64-75 ft. Please revise accordingly across all documents. Please ensure all inconsistencies, including those noted throughout these comments, are resolved before resubmitting SEQRA application materials.	[General Response] The Project Description and all associated application materials—including the Elevations, Site Plans, Noise Study, and EAF—have been audited and revised for consistency. The finalized project dimensions are approximately as follows: Roof Ridge: 46 feet Building Parapet: 52 feet Mechanical Platform: 54 feet Top of Acoustic Screen: 64 feet
Technical Summaries and Exhibits Comments			
Arch. Massing	**3.A.1**	As stated above, building heights given in the various documents of the Updated Application range significantly, to as high as 75 ft. in the EAF. Revise to ensure all building dimensions including rooftop screening are consistent across all documents.	**[General Response]** Acknowledged. All associated application materials have been audited and revised for consistency.
Visual Impact Analysis	**3.B.1-3**	In response to the Prior Memo, the Updated Application provided additional viewpoints including directly north of the North Campus, as well as an additional viewpoint from the western terminus of Patterson Road and the western border of the Tonawanda Seneca Nation's ("Nation") Territory adjacent to the North Campus. However, the Updated Application did not include additional visual simulations at the Nation border adjacent to the STAMP Site for the South Campus, despite being requested. The Nation has expressed deep concern about potential visual impacts for the Project to the Nation's Territory as a Traditional Cultural Property. Please provide additional visual simulations at the Nation border adjacent to the STAMP Site for the South Campus (southern end of STAMP). Additional viewpoints should meet or exceed analysis completed for prior iteration of Project. Please ensure that the updated visual simulations reflect the final determined height of all structures and that all documentation is consistent relative to final height. a. As an example of the requested viewpoints from the boundary of the Nation, see the attached visual assessment prepared for STAMP infrastructure in 2023 by Saratoga Associates. See Exhibit A. 2. Simulated views must also reflect proposed generator yard screening. 3. The visual simulations depict visual impacts during summer conditions which do not provide an accurate depiction of worst-case visual impacts. a. Provide simulated views under "leaf off" winter conditions.	**[III-B Visual Impact Analysis Technical Summary]** Acknowledged. The Visual Impact Analysis has been revised to incorporate additional view points as well as additional clarity for landscape and screening environments.
Site Plans	**3.C.1**	The Tech Team incorporates the comments provided by the Planning Board engineer Robert Klavoon by letter dated February 25, 2026, and comments provided by the Planning Board consultants Nina Bailou and Andrew Reilly by separate letter dated February 25, 2026, attached hereto as Exhibit B (collectively, the "Site Plan Comments") regarding the Project Site Plans. The Tech Team requests that Stream provide GCEDC with its responses to the Site Plan Comments and all updated or additional documents thereto when they are submitted.	**[General Response]** Stream acknowledges the Tech Team's request and confirms that all responses to Site Plan Comments, including any updated or supplemental documents, will be provided to the GCEDC upon submission.

Site Plans	**3.C.2**	MP-1, Stormwater ponds on both site plans do not show discharge locations. Revise accordingly.	[General Response] Note Overall Site Plan is representative of an overall project overview, not a detailed site plan. For additional information regarding stormwater and related outlet locations, see sheets C-151-S, C-152-N, and C-153-N for additional information.
Site Plans	**3.C.3**	MP-1, Add square footages to each building and total number of parking spaces for each campus. Label features such as the substation and stormwater ponds.	[General Response] Note Overall Site Plan is representative of an overall project overview, not a detailed site plan. For additional information regarding stormwater and related outlet locations, see sheets C-151-S, C-152-N, and C-153-N for additional information.
Site Plans	**3.C.4**	C-121-N and SP-1 building dimensions do not match dimensions given in EAF; and building heights do not match heights provided in other documents (including the Elevations) in the Updated Application as discussed above. Please revise all documents as applicable. a. Additionally, the Noise Study states that generator yards enclosing the backup power generators at each Campus with screening to a height of 20-30 ft. are proposed but such screening is not depicted in in the Site Plans. Revise accordingly update all Site Plans, Elevations, and visual renderings accordingly.	**[General Response]** The EAF, Site Plans, and Elevations have been updated to ensure consistency with the proposed project dimensions. Further, a visual representation of the building-mounted acoustic screening is shown in the visual impact assessment and the Generator Yard screening has now been noted on the associated site plans.
Site Plans	**3.C.5**	C-122-N, provide proposed substation details.	**[General Response]** Detailed specifications are provided in the Site Plans submitted to the Town of Alabama on March 18, 2026. A courtesy copy is included with this submission to facilitate the closure of this comment.
Site Plans	**3.C.6**	C-122-N General Construction Notes, Note 4, references the sanitary sewer shall be constructed to Town of Alabama and Genesee County Standards. The sanitary sewer will be owned and operated by the STAMP Sewer Works Corporation. Revise this note as such.	**[General Response]** Refer to Town of Alabama site plan application checklist. Note is required to meet town's requirement. Note will be revised on site plan drawings and notes to contact STAMP Sewer Works Corporation.
Site Plans	**3.C.7**	C-122-N General Construction Notes, Note 14, references all signage shall conform to the Town of Alabama regulations. Crosby Road is a County Road. This note should be revised as such.	**[General Response]** Refer to Town of Alabama site plan application checklist. Note is required to meet town's requirement. Acknowledged note to be added to reference county standards for road signage on county owned roadways.
Site Plans	**3.C.8**	C-122-N General Construction Notes, Note 16, references the geotechnical report prepared by Whitestone Associates and provides the date with "XXXX." Revise note with correct date of geotechnical report.	**[General Response]** South Campus Geotechnical Report received March 12, 2026 from Whitestone Associates. This has been revised on the relevant technical documentation. North Campus Geotechnical Report is expected: xx/xx/xxxx
Site Plans	**3.C.9**	C-122-N General Construction Notes, Note 17, references providing the Town of Alabama with 48-hours notice of starting work for the water service connection. The STAMP Water Works Corporation owns the system and is operated by the Town of Batavia. This note should be revised as such.	**[General Response]** Note is required, standard language provided by Town of Alabama. Acknowledged note to be revised in coordination with Town review and approval.
Site Plans	**3.C.10**	C-122-N General Construction Notes, Note 4, references notifying Genesee County 48-hours prior to making the sanitary sewer connection. The sanitary sewer will be owned and operated by the STAMP Sewer Works Corporation. Revise this note as such	**[General Response]** Note is required, standard language provided by Town of Alabama. Acknowledged note to be revised in coordination with Town review and approval.
Site Plans	**3.C.11**	SP-1, South Campus, General Construction Notes, revise as noted above.	**[General Response]** Note is required, standard language provided by Town of Alabama. Acknowledged note to be revised in coordination with Town review and approval.
Site Plans	**3.C.12**	10-Acre Logistics Area Layout, coordinate with National Grid for overhead power signage requirements.	**[General Response]** Acknowledged.

Site Plans	**3.C.13**	10-Acre Logistics Area Layout, constructing stone walkway from Logistics Area to South Campus over top of Trib 5 (existing 42" Culvert Pipe). This will require a US Army Corps of Engineers permit if disturbing any area between the tops of the stream bank.	**[General Response]** Acknowledged.
Site Plans	**3.C.14**	10-Acre Logistics Area Layout, Stormwater Management and SWPPP will need to be prepared for this area	**[General Response]** Acknowledged. Refer to provided Site Plan Application SWPPP, dated March 18, 2026.
Stormwater Technical Summary	**3.D.1**	The provided stormwater management information discusses existing stormwater management already developed for the South Campus. Provide details and calculations to demonstrate that these existing facilities are adequate for the Project specifications currently proposed.	**[General Response]** Acknowledged. Refer to provided Site Plan Application SWPPP, dated March 18, 2026.
Stormwater Technical Summary	**3.D.2**	The provided stormwater management information discusses existing stormwater management already developed for the South Campus. Provide details and calculations to demonstrate that these existing facilities are adequate for the Project specifications currently proposed.	[General Response] Note the South Campus stormwater management approach has been reviewed with the Town of Alabama and New York State DEC as re-development, leveraging the previously approved and constructed stormwater infrastructure, which conforms to NYS DEC guidelines.
Stormwater Technical Summary	**3.D.2.A**	The provided stormwater management information discusses existing stormwater management already developed for the South Campus. Provide details and calculations to demonstrate that these existing facilities are adequate for the Project specifications currently proposed.	[General Response] Note the South Campus stormwater management approach has been reviewed with the Town of Alabama and New York State DEC as re-development, leveraging the previously approved and constructed stormwater infrastructure, which conforms to NYS DEC guidelines.
Stormwater Technical Summary	**3.D.2.B**	Note, any additional flow over current conditions has the potential to increase the size of Wetland 10 and cause erosion along Tributary 2 and the same applies for outlet ii. These drainages are ephemeral, with low flows of water primarily during snowmelt in the spring. Flow amounts greater than current flows, or outside of the spring season, could have negative impacts to the continuing agricultural activities on STAMP as well as downstream water bodies. Please confirm stormwater management systems for the Project will result in flows equal to or less than currently experienced on the North Campus and provide analysis of impacts to all downstream receiving waterbodies from Project stormwater flows.	[General Response] The North project site will feature eleven (11) post-construction Stormwater Management Practice (SMP) facilities, consisting of filtration bioretention units and a micro pool extended detention pond. All SMPs are located within the project limits and are designed in accordance with the NYSDEC Stormwater Management Design Manual (July 31, 2024), which regulates flows to maintain pre-development conditions.
Stormwater Technical Summary	**3.D.3**	The Nation has previously expressed concern that development of the Project could result in downstream impacts to the Nation's Territory. In preparing revisions to address the above comments, 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. Narrative discussion in the III-d Stormwater tech summary should be updated to directly address this question.	**[General Response]** See response to comment 3.D.2.B for additional information.
Stormwater Technical Summary	**3.D.4**	Summary indicates the stormwater for the 10-acre logistics area will flow to the west side of the parcel to the existing construction ditch and check dams. Will this ditch be adequately sized for stormwater runoff from the 10-acre area?	**[General Response]** Yes. All temporary improvements to the logistics area will be designed in accordance with the NYSDEC Stormwater Management Design Manual (July 31, 2024), which regulates flows to maintain pre-development conditions.
Stormwater Technical Summary	**3.D.5**	Summary indicates both the North Campus and South Campus logistics areas will be temporary. How long are these areas anticipated to be in use? Is there a plan for restoration following their use?	**[General Response]** The logistics areas will be in use for the duration of the construction period of the project. Following construction, these temporary areas will be restored to their pre-development grade and agricultural utility to the greatest extent possible. Restoration activities will include soil de-compaction and the re-application of stockpiled native topsoil in accordance with applicable New York State agricultural best management practices.

Stormwater Plan	**3.E.1**	C-183-N. It appears that the stormwater will be discharged to the southwest corner. What is the receiving body of water for this discharge? a. Confirm downstream impacts to existing tributaries, onsite wetlands, and offsite hydrology. Will this impede future development?	**[General Response]** Stormwater discharges to the southwest corner will be managed to maintain pre-development peak flow rates and water quality in accordance with NYSDEC Stormwater Management Design Manual standards. These criteria are specifically engineered to prevent adverse impacts on downstream tributaries, wetlands, and hydrology. Consequently, this design ensures that future development will not be impeded, as it must naturally account for existing upstream flows; where necessary, stormwater easements can be established to ensure long-term compatibility with site-specific layouts and performance targets for future development areas.
Stormwater Plan	**3.E.2**	C-184-N. It appears that the stormwater will be discharged to the southwest corner. What is the receiving body of water for this discharge? If there is no receiving body, a level spreader device should be used.	**[General Response]** Stormwater discharges to the southwest corner will be managed to maintain pre-development peak flow rates and water quality in accordance with NYSDEC Stormwater Management Design Manual standards. These criteria are specifically engineered to prevent adverse impacts on downstream tributaries, wetlands, and hydrology. Consequently, this design ensures that future development will not be impeded, as it must naturally account for existing upstream flows; where necessary, stormwater easements can be established to ensure long-term compatibility with site-specific layouts and performance targets for future development areas.
Photometric Plan	**3.F.1**	Photometric plans should be expanded to show full extent of lighting impacts beyond Campus parcel boundaries. If lighting impacts extend beyond Campus boundaries, provide explanation of additional screening or mitigation proposed to eliminate such impacts and revise other documents as applicable.	**[III-f | Photometric Plan]** The submitted Photometric Plans already illustrate lighting impacts extending 20 feet beyond all property lines, confirming the full extent of potential light trespass. As demonstrated by the calculated values on these plans: Boundary Performance: All property lines—and the areas 20 feet beyond them—consistently show 0.0 foot-candles (fc). Design Intent for Safety: The only exceptions where values exceed 0.0 fc at the boundary are at key interfaces with the public Right-of-Way (ROW) and site entrances. In these specific locations, values of up to 0.6 fc are provided to ensure the safety of motorists and pedestrians entering, exiting, or passing the facility.
Photometric Plan	**3.F.2**	Does the Photometric Plan include the proposed wall packs on the side of the data center buildings? If not please revise to include.	**[III-f | Photometric Plan]** The submitted Photometric Plans indicate the location of all associated wall packs on the proposed buildings.
Photometric Plan	**3.F.3**	The Photometric Plan indicates that the International Dark Sky Fixture Seal of Approval is available only for the lighting labeled S1, whereas, the proposed lighting labeled FE and ST is not identified as eligible for same. Please note all lighting must be dark sky compliant. Please revise or clarify accordingly.	**[III-f | Photometric Plan]** All proposed lighting fixtures have been revised and verified to carry the International Dark-Sky Association (IDA) Fixture Seal of Approval to ensure site-wide compliance with dark sky standards.
Landscape Plan	**3.G.1**	C-601-N. There are no proposed plantings along the western boundary between the stormwater management ponds and the southern property line to provide additional shielding to the Nation's Territory. Explain why screenings are not necessary to mitigate environmental impacts or revise landscaping plan to add additional plantings in this area.	**[III-g | Landscape Plan]** Additional landscape plantings have been provided along the western and southern property boundaries to facilitate additional screening and reforestation objectives.
Landscape Plan	**3.G.2A**	C-602-N. a. Bio-Retention Tree Planting List (ST): Fringe-tree (Chionanthus virginicus) is not native to New York and should not be included within the planting list. The rest of the species are acceptable. Please revise accordingly.	**[III-g | Landscape Plan]** Acknowledged. Fringe-tree (Chionanthus virginicus) has been removed from the proposed species list.

Landscape Plan	**3.G.2B**	Bio-Retention Tree Planting List (OT): Sweetbay magnolia (Magnolia virginiana) is only native to extreme southeastern New York and will not survive well this far north and should be removed from the planting list. Please revise accordingly.	**[III-g | Landscape Plan]** Acknowledged. Sweetbay Magnolia (Magnolia virginiana) has been removed from the proposed species list.
Landscape Plan	**3.G.2C**	Bio-Retention Seed Mix: Alkali grass (Puccinellia distans) is not native. Recommend replacing with switchgrass (Panicum virgatum) or red-topped panic grass (Coleataenia rigidula). Creeping bentgrass (Agrostis stolonifera) is not native. Recommend replacing with Autumn bentgrass (Agrostis perennas). Please revise accordingly.	**[III-g | Landscape Plan]** Acknowledged. Alternative native species will be considered for Bio-Retention Seed Mix.
Landscape Plan	**3.G.3A**	There is a lack of proposed plantings to the western boundary between the stormwater management ponds and the southern property line. Explain why screenings are not necessary to mitigate environmental impacts or revise landscaping plan to add additional plantings in this area.	**[III-g | Landscape Plan]** Additional landscape plantings have been provided along the western and southern property boundaries to facilitate additional screening and reforestation objectives.
Landscape Plan	**3.G.3B**	Avoid the use of boxwood in landscape plantings as boxwood blight is becoming increasingly common and leads to the death of boxwoods where it is found. A possible substitute is inkberry holly (Ilex glabra), a native species that is commonly used in commercial landscape plantings. Please revise accordingly.	[III-g | Landscape Plan] Acknowledged. Boxwood has been removed from the proposed species list and substituted for Inkberry Holly (Ilex Glabra)
Traffic Technical Summary	**3.H.1**	Updated Application contradicts information in Matrix regarding number of heavy vehicle trips (2-3 vs. 6-8), clarify and correct.	**[III-h | Traffic Technical Summary]** The Traffic Technical summary has been updated for consistency.
Traffic Technical Summary	**3.H.2A-B**	2. Applicant needs to provide more detailed information on construction traffic impacts which is identified in the comment response matrix ("Matrix"), included with the Updated Application, to result in 800-1,000 employee vehicle trips per day and 100-200 truck trips per day at peak construction. a. Include description of construction traffic impacts and mitigation controls proposed and update Traffic Technical Summary with detailed discussion of same. b. There are 942 parking spaces reserved for the South Campus only in the Logistics Area during construction. Not clear what is reserved for North Campus. Provide detailed explanation of construction parking needs and how such needs will be satisfied for both campuses throughout construction process.	[II | Project Description] A description of construction traffic has been added to the Construction narrative in the project description. Further, additional exhibits have been added under III-c | Site Plans illustrating traffic management and routes. It is anticipated that the total spaces / location denoted in the South Campus logistics area will remain consistent throughout the construction period.
Backup Power Technical Summary	**3.J.1**	The Updated Application indicates the Project will utilize Tier 2 backup power generators. Please provide an analysis of the feasibility to utilize Tier 4f certified generators for the Project.	**[III-n | Air Emissions Technical Summary]** The Project will utilize Tier 2 certified engines equipped with Miratech emissions control technology to meet EPA Tier 4 exhaust standards while avoiding the mechanical reliability issues, such as "wet stacking," that factory Tier 4f engines face during the facility's required low-load monthly maintenance cycles. This configuration ensures the site remains below Title V major source thresholds through an enforceable 500-hour annual runtime limit per engine, monitored via non-resettable hour meters. Detailed emission calculations and an Operation and Maintenance (O&M) plan will be submitted to ensure continuous compliance with NSPS Subpart IIII and NYSDEC requirements.
Geotechnical Summary	**3.L.1**	The Updated Application references geotechnical investigations performed for the South Campus in 2017 & 2021. Please update all information for both the North and South Campus in the Updated Application with information from the newly conducted geotechnical investigation performed for the Project.	**[III-l | Geotechnical Technical Summary]** Acknowledged. The geotechnical technical summary has been updated to include findings of the 2026 geotechnical studies.
Geotechnical Summary	**3.L.2**	What is the anticipated completion date for the geotechnical investigation currently underway for the Project?	**[III-l | Geotechnical Technical Summary]** All geotechnical studies are anticipated to be completed by April 3, 2026.

Geotechnical Summary	**3.L.3**	Geotechnical discussion mentions the soils are "favorable" for the proposed development. To what extent will the sites be graded? Provide conceptual cut/fill volumes? Where will any unsuitable, or excess soils be hauled to or stockpiled?	**[III-l | Geotechnical Technical Summary]** Geotechnical evaluations indicate generally favorable conditions; however, in the event that isolated pockets of unsuitable soils are encountered during localized grading, they will be strategically managed to ensure site integrity. Such materials will either be reutilized on-site in non-structural areas (such as landscape berms or green space) to optimize the site's mass balance, or hauled to an appropriately permitted facility for beneficial reuse or disposal. This dual-path approach ensures that all structural pads and infrastructure remain founded on high-quality structural fill while minimizing the project's environmental footprint.
Geotechnical Summary	**3.L.4**	The final paragraph, first sentence, states "the site naturally drains into streams and wetlands on the Nation's territory[.]" This is incorrect, as Tributary 2 and drainages north flow into Wetland 4, which outlets through Tributary 1 onto private property north of STAMP and does not flow into the Nation's Territory. Please revise accordingly.	**[III-l | Geotechnical Technical Summary]** Acknowledged. The geotechnical technical summary has been updated accordingly.
Air Emissions	**3.N.1**	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]** Stream acknowledges that the GCEDC may retain an independent Air Emissions consultant and stands ready to review and address any forthcoming comments.
Acoustics Technical Summary	**3.O.1**	Please note, the GCEDC is retaining a separate noise consultant to fully review noise impacts materials. Thus, more comments may be forth-coming.	**[General Response]** Stream acknowledges that the GCEDC may retain an independent noise consultant and stands ready to review and address any forthcoming comments.
Emergency Services Confirmation	**3.P.1**	Please provide as attachments to the Updated Application confirmation letters or other documentation of communication and feedback with emergency service providers referenced in the Updated Application.	**[General Response]** Associated documentation of communication has been provided as attachments for context.
Emergency Services Confirmation	**3.P.2**	Provide additional information on the uninterruptable battery storage systems proposed for the Project--the design and size, and their potential hazards.	**[General Response]** Additional information has been provided in the III-q Emergency Response Procedures Technical Summary and an exhibit of the ESS Battery Compliance has been provided for context.
Emergency Services Confirmation	**3.P.3**	Provide a site specific Emergency Action Plan as referenced in the Updated Application, or provide an analogous example.	[General Response] An example site specific Emergency Action Plan has been provided for context.
Emergency Services Confirmation	**3.P.4**	The purpose of the Emergency Services Technical Summary is to provide a facility specific emergency services impact study ("ESIS") which the STAMP GEIS requires the ESIS be prepared and submitted to an informal committee of local and county emergency response representatives. Please revise to clarify same.	[General Response] An informal committee is scheduled to be convened in the next two weeks for review of the latest technical design criteria, operational procedures, and emergency action plans to provide record of substantial compliance with local safety standards and regional emergency management objectives. As such, applicable agencies have been briefed on the project scope and emergency procedures, and provided feedback on the project as summarized under III-p | Emergency Services Confirmation Technical Summary.
Disadvantaged Communities Burden Assessment	**3.R.1**	Traffic impacts need to be updated with additional truck trips provided in Traffic Technical Summary.	**[5.0 Disadvantaged Communities Burden Analysis - Traffic Narrative]** Traffic Impacts have been updated for consistency with Traffic Technical Summary.

Disadvantaged Communities Burden Assessment	**3.R.2**	Clarify whether there will be "three stormwater management areas" in total or three for each Campus (North & South). Matrix response says it was updated but it does not appear to have provided clarity. a. Provide details on the discharge of these stormwater management areas: volume, quality, and receiving waters impacts.	**[General Response]** The north site currently drains to four (4) separate sub-watersheds and these are maintained under proposed conditions with a total of twelve (12) post-construction stormwater management practice (SMP) facilities. The south site has an approved and constructed stormwater management design for the tract that includes a bio-retention basin, a vegetated sediment basin and a vegetated dry detention basin. In post-development conditions, the drainage patterns of the approved site are maintained. Stormwater runoff from the majority of the project site is collected and conveyed to the existing stormwater management facilities. Stormwater volume and quality will be designed in accordance with the Town of Alabama Site Plan Application Checklist drainage design requirements and NYSDEC Stormwater Design Manual.
Disadvantaged Communities Burden Assessment	**3.R.3**	Detail the distance between both Campuses and the Nation's Territory and whether operations from Project Double Reed is anticipated to have any impact on wildlife on the Nation's Territory with explanation/analysis relative to same.	**[5.0 Disadvantaged Communities Burden Analysis - Ecological Impact and Mitigation Narrative]** Ecological Impact and Mitigation Narrative has been added to the report detailing distance between campuses and Nation's Territory as well as operational characteristics affecting wildlife.
Disadvantaged Communities Burden Assessment	**3.R.4**	Summarize economic incentives and benefits pledged through financial assistance application with GCEDC.	**[3.0 Description of Proposed Action - 3.2 Nature of Proposed Action Narrative]** Summary of economic benefits has been added to the report.
Disadvantaged Communities Burden Assessment	**3.R.5**	Additional information on emergency response plans should be updated per any updates to those sections above.	**[General Response]** Acknowledged.
Disadvantaged Communities Burden Assessment	**3.R.6**	The DAC Burden Report references a letter received from the Town of Alabama regarding adequacy of emergency services of prior project; provide updated letter applicable to the current Project.	**[General Response]** We have attached the February 28, 2025, letter confirming adequacy in correspondence with the Town of Alabama to the application report for additional context.
LEAF Part 1 Form			
Proposed and Potential Development	**1**	Global: As previously requested by NYSDEC, the EAF should be resubmitted on the updated draft EAF form containing questions evaluating the Project's impacts on DACs. A link to the draft EAF and additional guidance documents can be found at: https://dec.ny.gov/regulatory/regulations/proposed-emergency-recently-adopted-regulations/state-environmental-quality-review-act-regulatory-revisions	**[General Response]** EAF Part 1 Form has been revised.
Proposed and Potential Development	**D.1 (1)**	D.1 Proposed and Potential Development 1. D.1.B: States there will be impacts to 135 acres, including a 5 acre "Off site Easement." All other Project descriptions only indicate 130 acres of disturbance in total. Provide correction/clarification and further information on "Off-site Easement." Correct all information in Updated Application as necessary.	[General Response] All relevant descriptions have been updated. The off-site easement has been denoted as telecommunications infrastructure supporting the interconnectivity of the two campuses. This infrastructure is discussed in detail under the 'Networking' narrative of the project description of the application narrative.
Proposed and Potential Development	**D.1 (2)**	D.1.E: States that construction will take place in three phases over a four year period. Please provide a detailed construction mitigation plan addressing all potential environmental impacts associated with construction of the Project including but not limited to, traffic, water demand, noise, odors and dust.	**[II | Project Description]** See Construction narrative of Project Description for additional information.
Proposed and Potential Development	**D.1 (3)**	. D.1.g. ii: Building height details conflict with Site Plan figures. Correct/Confirm.	**[General Response]** EAF Part 1 Form has been revised.
Project Operations	**D.2 (1)**	D.2.b: Will the Telecom Infrastructure encroach on the wetlands shown in the applicable concept map? If so, please clarify in EAF.	**[General Response]** EAF Part 1 Form has been revised. The project will avoid and minimize impacts to Tributary 5 and Tributary 3, which are crossed using horizontal directional drilling. HDD will be designed to pass beneath the wetland and tributary features with sufficient depth to avoid surface disturbance, consistent with the standard engineering practice for trenchless installation.

Project Operations	**D.2 (2)**	D.2.c.: As discussed above, the Engineer Reports conflict with the estimated water usage. Please revise across all relevant documents and ensure no inconsistencies	**[General Response]** EAF Part 1 Form has been revised for consistency with the latest Engineer Reports. However, note that the figures provided in the EAF carry a conservative percentage above engineering estimates to account for occasional temporary increases, for example; construction phases, maintenance teams, special projects can increase temporary headcounts.
Project Operations	**D.2 (3)**	D.2.d.: As discussed above, the Engineer Reports conflict with the estimated wastewater generated by the Project. Please revise across all relevant documents and ensure no inconsistencies. • Identify any improvements required at the Oakfield WWTF to handle the Project flows.	**[General Response]** The EAF Part 1 and Engineer's Reports have been revised for consistency and clarity, confirming that project flows are within the Oakfield WWTF design capacity and, as evidenced by the will-serve letters from the GCEDC dated January 5, 2026, no improvements are required at the facility to handle these flows. See III-t | Supplementary Information.
Project Operations	**D.2 (4)**	D.2.e.i: Indicates 90 acres of impervious surface. Does this include the impervious surface of the Logistic areas (North Campus 30-acres, South Campus 10-acres)? • Stormwater management must be provided for the Logistic Areas. Revise as necessary.	**[General Response]** EAF Part 1 Form has been revised. Refer to provided Site Plan Application SWPPP for detail regarding Construction Logistics areas stormwater management plans.
Project Operations	**D.2 (5)**	D.2.j.: Update truck trips per above comment if applicable, and provide construction related vehicle trips.	**[General Response]** EAF Part 1 Form has been revised.
Land Uses on and Surrounding the Project Site	**E.1. (1.a)**	E.1.b.: These land use and cover-type calculation appear to remain incorrect and must be revised. The areas encompassing the former (and current) residential properties, along with the hedgerow between the two agricultural fields, should be calculated within the "meadows, grasslands, or brushlands" category instead of the agricultural category.	**[General Response]** EAF Part 1 Form has been revised.
Land Uses on and Surrounding the Project Site	**E.1 (1.b)**	E.1.b.: These land use and cover-type calculation appear to remain incorrect and must be revised. It appears the South Campus is included within the agricultural category when it should be within the "roads, buildings, and other paved or impervious surfaces" category.	**[General Response]** EAF Part 1 Form has been revised.
Land Uses on and Surrounding the Project Site	**E.1 (1.c)**	E.1.b.: These land use and cover-type calculation appear to remain incorrect and must be revised. Explain or correct the loss of ~127 acres of agricultural land identified in this section when development will only be 90 acres? Are the temporary laydown areas included within this calculation, and will they be restored post-construction and be useable for agricultural again? If so, revise calculations.	**[General Response]** The total acerage figure represents the total limit of disturbance, which includes approximately 40 acres of temporary construction logistics and laydown areas in addition to the 90-acre permanent footprint. Following construction, these temporary areas will be restored to their pre-development grade and agricultural utility to the greatest extent possible. Restoration activities will include soil de-compaction and the re-application of stockpiled native topsoil in accordance with applicable New York State agricultural best management practices. We will revise the project documents to distinguish between these temporary disturbances and the 90 acres of permanent conversion.
Natural Resourses on or Near Project Site	**E.2 (1)**	E.2.h.: As detailed above, consider existing hydrology, feeding existing drainage ways and wetlands offsite	**[General Response]** Stormwater discharges will be managed to maintain pre-development peak flow rates and water quality in accordance with NYSDEC Stormwater Management Design Manual standards. These criteria are specifically engineered to prevent adverse impacts on downstream tributaries, wetlands, and hydrology. Consequently, this design ensures that future development will not be impeded, as it must naturally account for existing upstream flows; where necessary, stormwater easements can be established to ensure long-term compatibility with site-specific layouts and performance targets.
Natural Resources on or Near Project Site	**E.2 (1.a)**	Describe regulated streams/tributaries consistent with the wetland/stream delineation for the STAMP site. i. Under subparagraph iv, Wetlands 15 and 16 are not regulated, thus do not need to be included whereas tributaries 2 and 5 need to be included within the "streams" section.	**[General Response]** EAF Part 1 Form has been revised.

Natural Resources on or Near Project Site	**E.2 (1.b)**	Note any potential offsite stream/wetland impacts from regrading of the project site.	[General Response] EAF Part 1 Form has been revised. Offsite improvements include telecommunication duct banks for connection between the north and south campuses. These alignments will avoid and minimize impacts to Tributary 5 and Tributary 3 by using horizontal directional drilling. HDD will be designed to pass beneath the wetland and tributary features with sufficient depth to avoid surface disturbance, consistent with the standard engineering practice for trenchless installation. See 'Environmental Management' narrative, 'Construction' narrative, and III-I Geotechnical Technical Summary of application report for additional detail regarding wetland impacts and mitigation.
Natural Resources on or Near Project Site	**E.2 (1.c)**	Will there be offsite wetland water supply impacts from site development?	**[General Response]** No off-site wetland water supply impacts are anticipated. The project is designed to maintain existing hydrologic patterns by strictly adhering to the NYSDEC Stormwater Management Design Manual (July 31, 2024), which ensures that post-development runoff and infiltration rates remain consistent with pre-development conditions. See 'Environmental Management' narrative, 'Construction' narrative, and III-I Geotechnical Technical Summary of application report for additional detail regarding wetland impacts and mitigation.
Natural Resources on or Near Project Site	**E.2 (2)**	The heartleaf plantain and least bittern do not occur on the portion of the STAMP Site comprising the North and South Campuses. Please revise.	**[General Response]** EAF Part 1 Form has been revised.
Natural Resources on or Near Project Site	**E.2 (3)**	This section must be revised to state that development of the Project will force deer and turkey to avoid the North and South Campuses, pushing them toward undeveloped areas, such as the Nation's Territory, which is used for hunting.	**[General Response]** EAF Part 1 Form has been revised. Development of the STAMP North and South Campuses will naturally reorient local
Designated Public Resources On or Near Project Site	**E.3**	E.3.b.: This incorrectly states there are no "agricultural lands consisting of highly productive soils." Portions of the site are mapped with soils that are considered "Farmland of Statewide Importance" which are highly productive soils. Please revise accordingly.	**[General Response]** EAF Part 1 Form has been Revised Portions of the project area contain soils classified as 'Farmland of Statewide Importance'; (Canandaigua and Lakemont silt loams) however, these highly productive soils represent a minor percentage of the overall Site Plan. The majority of