III-r | DISADVANTAGED COMMUNITIES (DAC) BURDEN ASSESSMENT

Disadvantaged Communities Burden Assessment

December 2025
Updated April 2026

Project Double Reed

Genesee County Science, Technology, and Advanced Manufacturing Park
Alabama, New York

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TABLE OF CONTENTS

List of Acronyms

ASF	Air State Facility Permit
CJWG	New York's Climate Justice Working Group
CLCPA	Climate Leadership and Community Protection Act
DAC	Disadvantaged Communities
ECL	Environmental Conservation Law
EMS	Emergency Medical Services
FGEIS	Final Generic Environmental Impact Statement
GCEDC	Genesee County Economic Development Center
GHG	Greenhouse Gas
GPD	Gallons per Day
IT	Information Technology
ITE	Institute of Transportation Engineers
MW	Megawatt
NYC	New York City
NYDEC	New York State Department of Environmental Conservation
PPP	Public Participation Plan
SEQRA	State Environmental Quality Review Act
SPDES	State Pollutant Discharge Elimination System
STAMP	Science, Technology, and Advanced Manufacturing Park
Stream	Stream US Data Centers, LLC

1.0 Introduction

This Disadvantaged Communities (DAC) Burden Assessment has been prepared to meet the requirements of Environmental Justice Siting Law (EJ Siting Law) and DEP 24-1, to the extent applicable, for the Project Double Reed. This report assesses potential impacts associated with the operation of Project Double Reed, particularly those affecting a Disadvantaged Community (DAC).

The EJ Siting Law requires lead agencies under the State Environmental Quality Review Act (SEQRA) to consider whether an action may cause or increase a disproportional pollution burden on a DAC as part of the determination of significance for a proposed project and include an evaluation of whether the proposed action causes or increases any disproportionate pollution burden in a DAC where an environmental impact statement is required. DACs were first identified as a result of the Climate Leadership and Community Protection Act (CLCPA) to ensure that New York State's investments and actions to advance the Climate Law will benefit all communities and address climate inequities. For the purposes of this program, communities are evaluated by their census tract, which is a geographic unit defined by the U.S. Census Bureau. New York's Climate Justice Working Group (CJWG), comprised of representatives from State Agencies and Environmental Justice groups across the State, was formed to identify DACs. The CJWG plans to review the disadvantaged communities' criteria annually and make updates where necessary.

2.0 Description of Proposed Action

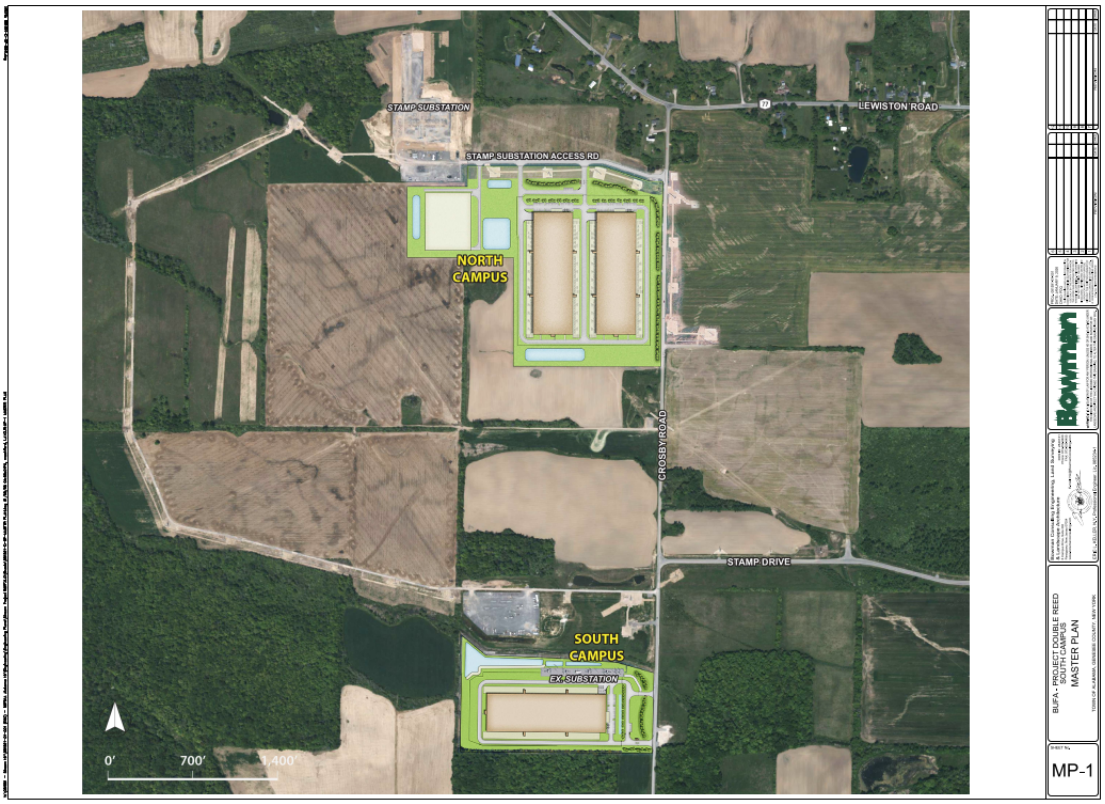
2.1. Overview

Stream US Data Centers, LLC (Stream) proposes to construct a data center within the Genesee County Science, Technology, and Advanced Manufacturing Park (STAMP) in the Town of Alabama, Genesee County, New York. The project will occupy 90 acres with 40 acres of STAMP land temporarily utilized for construction logistics area. Further, an additional 5 acres of off-site easements will be developed to support telecommunications infrastructure interconnectivity for the two campuses. The project includes three (3) two-story buildings totaling approximately 2.2 million square feet, along with associated roadways, campus security features, on-site circulation and parking areas, utility services and infrastructure, equipment storage areas, and operational yards. Stormwater management facilities will also be constructed to control and treat on-site runoff. The proposed project will be referred to as *Project Double Reed* throughout this report.

Project Double Reed was selected by the Genesee County Economic Development Center (GCEDC) through a competitive development application process to propose a data center on the STAMP site. A Final Resolution by the GCEDC Board was approved on March 6, 2025; however, Stream identified an opportunity to secure additional capacity and increase the scale of the project, requiring the GCEDC to rescind the Final Resolution and await an amended application from Stream. This report reflects the changes to the project.

Project Double Reed is located on the west side of Crosby Road, approximately 660 feet south of its intersection with Lewiston Road (Highway 77) as shown on Figure 1-1.

Figure 1-1: Site Plan



The full STAMP site underwent a previous SEQRA review, as outlined in the Final Generic Environmental Impact Statement (FGEIS) dated January 2012 and an Amended Findings Statement in July 2016. There are currently no air emission sources or stormwater SPDES outfalls on the property. Project Double Reed requires the submittal of an application to the New York State Department of Environmental Conservation (NYSDEC) for an Air State Facility (ASF) permit to support facility operations and submittal of a Notice of Intent for coverage under the State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activities (Permit No. GP-0-25-001).

2.2. Nature of Proposed Action

As previously noted, Project Double Reed is the proposed development of portions of the STAMP site to construct a new data center. To support this development, Project Double Reed is seeking an ASF permit for the project's stationary emission sources: up to twelve (12) backup generators used to support critical IT functions and essential building loads such as lighting and health, safety, and security systems. These generators will operate on diesel fuel stored in integrated belly tanks, each with an estimated capacity of approximately 9,500 gallons. These generators will be equipped

with selective catalytic reduction (SCR) emissions control technology intended to control emissions of oxides of nitrogen (NOx), volatile organic compounds (VOC), and particulate matter (PM) to meet the United States Environmental Protection Agency's (USEPA's) Tier 4 exhaust emissions standards established in Title 40 of the Code of Federal Regulations (40 CFR) Part 1039 Subpart B. Routine generator use will be limited to periodic testing and maintenance, while emergency operation during utility outages is expected to be infrequent due to the project's connection to high-voltage transmission infrastructure.

Project Double Reed will also require coverage under the NYSDEC SPDES General Permit for Stormwater Discharges from Construction Activities (Permit No. GP-0-25-001) for construction activities. The proposed development of the site is being engineered under the design criteria set forth in the New York State Department of Environmental Conservation's (NYSDEC) "Stormwater Management Design Manual" (SWM Design Manual) dated July 31, 2024. The project's north campus currently drains to four (4) separate sub-watersheds and these are maintained under proposed conditions. The north campus design includes twelve stormwater management practice (SMP) facilities to control stormwater volume and quality in accordance with the design standards. 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. Construction will create new stormwater outfalls, which will be covered under the general construction SPDES permit.

Under current conditions, stormwater in the project area sheet-flows along natural drainage pathways (e.g., ravines) toward wetlands located west of the site. Following development, stormwater from impervious surfaces will be captured, conveyed to the constructed stormwater features, and discharged accordingly.

Project Double Reed encompasses approximately 90 acres of permanent development area; 60 acres on the North Campus and 30 acres on the South Campus. This area includes an approximately 2.2 million-square-foot data center campus, housing three (3) two-story buildings. It will require approximately 500 MW of electrical power from the grid, utilize up to 12 backup generators for emergency purposes, use approximately 20,000 gallons per day (GPD) of water. An additional 40 acres will be used as temporary construction logistics areas in support of the project. Construction is expected to take approximately 48 months.

Project Double Reed represents a transformative investment in Genesee County, establishing a documented **3-to-1 local benefit ratio**. Based on independent third-

party analysis, the project generates **$1.96 billion in total local benefits** against $673.3 million in local costs. This net-positive fiscal impact is driven by substantial private capital investment and long-term revenue streams for local taxing jurisdictions.

Workforce and Wage Generation

The project functions as a primary engine for regional income, totaling $1.3 billion in new wages. This includes:

- Operational Phase: 125 direct data center roles and 45 skilled trade service positions, generating $564 million in payroll over 30 years.
- Construction Phase: Support for 6,000 construction jobs over five years, contributing $505 million in payroll, with an additional $278 million generated indirectly.

Municipal Revenue and Infrastructure Investment

The project provides a stable, long-term tax base through structured PILOT and Host Community agreements:

- Direct Revenues: $285.8 million in new revenue for Genesee County, the Town of Alabama, and the Oakfield-Alabama School District over 30 years. Notably, these fixed-value payments represent 115% of the standard assessed property tax value, contributing an additional $84.8 million beyond typical tax requirements.
- Sales Tax Contribution: Estimated electrical usage will generate $9 million annually in sales tax ($270 million over 30 years), supporting both the County and the City of Batavia.
- Infrastructure & Development: The project includes a $268 million private investment to complete critical electrical infrastructure at the STAMP site. Furthermore, it generates $146 million in project fees for the GCEDC to be reinvested into county-wide economic development and workforce initiatives.

Emergency Services: Annual fire district fees will total more than $5 million over 30 years, ensuring enhanced funding for the Town of Alabama Fire District.

2.3. Project Alternatives

As detailed in the DGEIS, several alternatives were proposed for the STAMP site, but ultimately the Preferred Alternative (the STAMP site) was selected because it offered the optimal combination of factors in terms of manageable environmental impact, minor agricultural and farmland impact, likelihood for land assembly success, community support, utilities, transportation access, workforce, and the likelihood for

the lowest cost of development given proximity to industrial class infrastructure to achieve the basic and overall purposes of the Project.

Additionally, the GCEDC received, reviewed, and considered three proposals for the data center at STAMP, as further detailed in the Final Resolution dated March 6, 2025. The evaluation concluded that Project Double Reed was “the most advantageous to the State, price and other factors considered, including, among other things, because the Company has provided more compelling substantiation for its proposal’s anticipated profitability, and because minimizes impacts on the environment…”

3.0 Location of Disadvantaged Communities

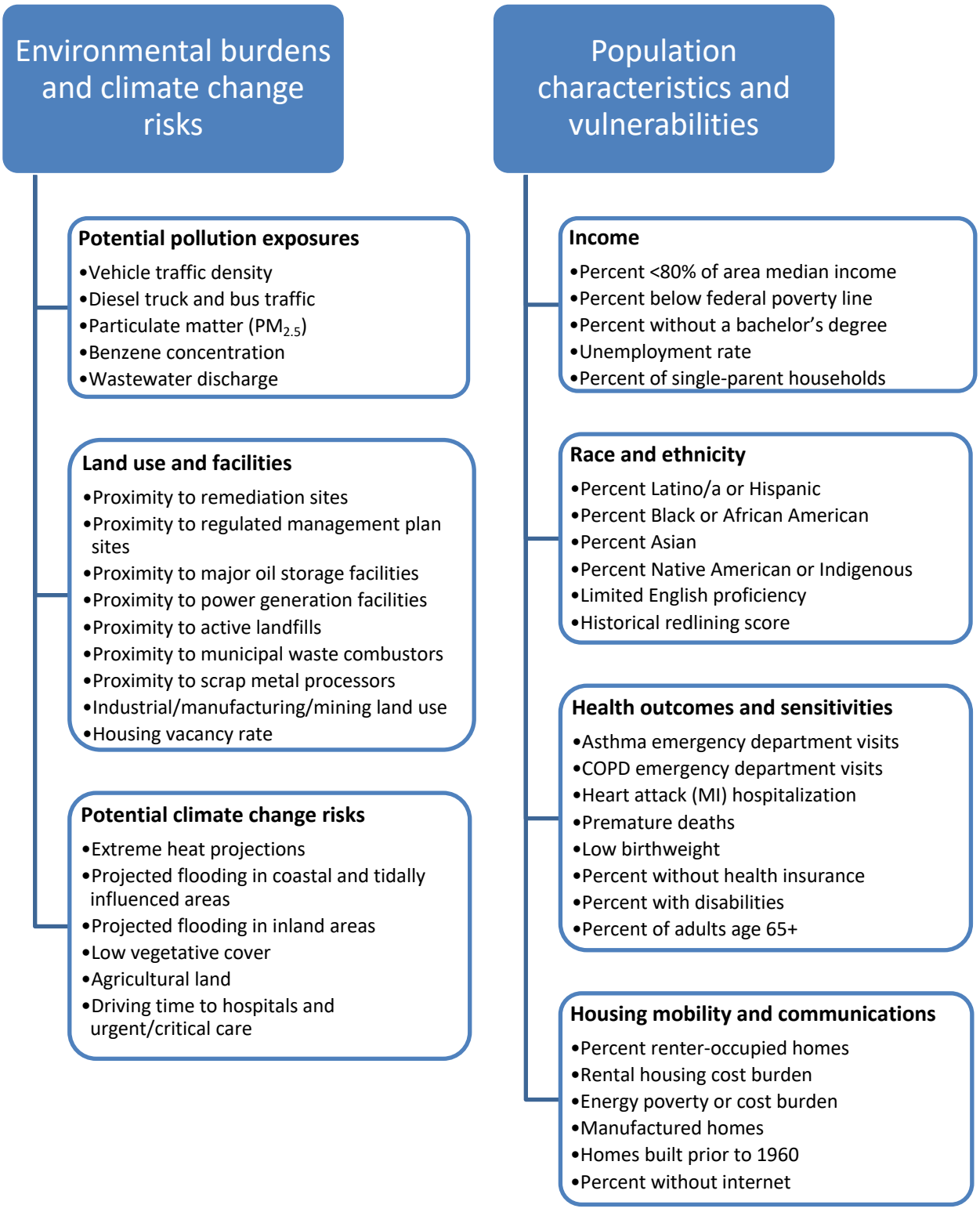
In identifying DACs, CJWG considers forty-five indicators within seven factors within two components. Figure 3-1 is intended to serve as a visual reference for the grouping of these considerations.

For each indicator, each census tract is assigned a value from the source dataset. Details on the scoring of the 45 indicators, including definition, data source, calculation method, and potential limitations, are available in Section 6.2 of the Technical Documentation[1]. As every indicator's raw data is measured in different units, a common scale is needed to combine and compare data across indicators.

Data is re-scaled by calculating a percentile rank for each census tract on each indicator; the results are the 45 indicator scores. Next, the seven factor scores are calculated as the weighted average of the indicator scores within each factor. Similarly, the two component scores are calculated as the weighted average of the factor scores within each component. All of the factors are weighted equally except for potential climate change risks, which is weighted double; the CJWG decided that environmental considerations should have the same weight as potential climate change risks. A combined score is calculated for each tract as the sum of the two component scores. Each tract is then assigned a combined score percentile rank. A tract's combined score percentile rank is defined as either its statewide combined score percentile rank, or its regional (NYC or rest-of-state) combined score percentile, whichever is highest. If the tract's combined score percentile rank is greater than 71.7, then that tract is designated as a DAC.

[1] https://climate.ny.gov/-/media/Project/Climate/Files/Disadvantaged-Communities-Criteria/Technical-Documentation-on-the-Disadvantaged-Communities-Criteria---Final-Version.pdf

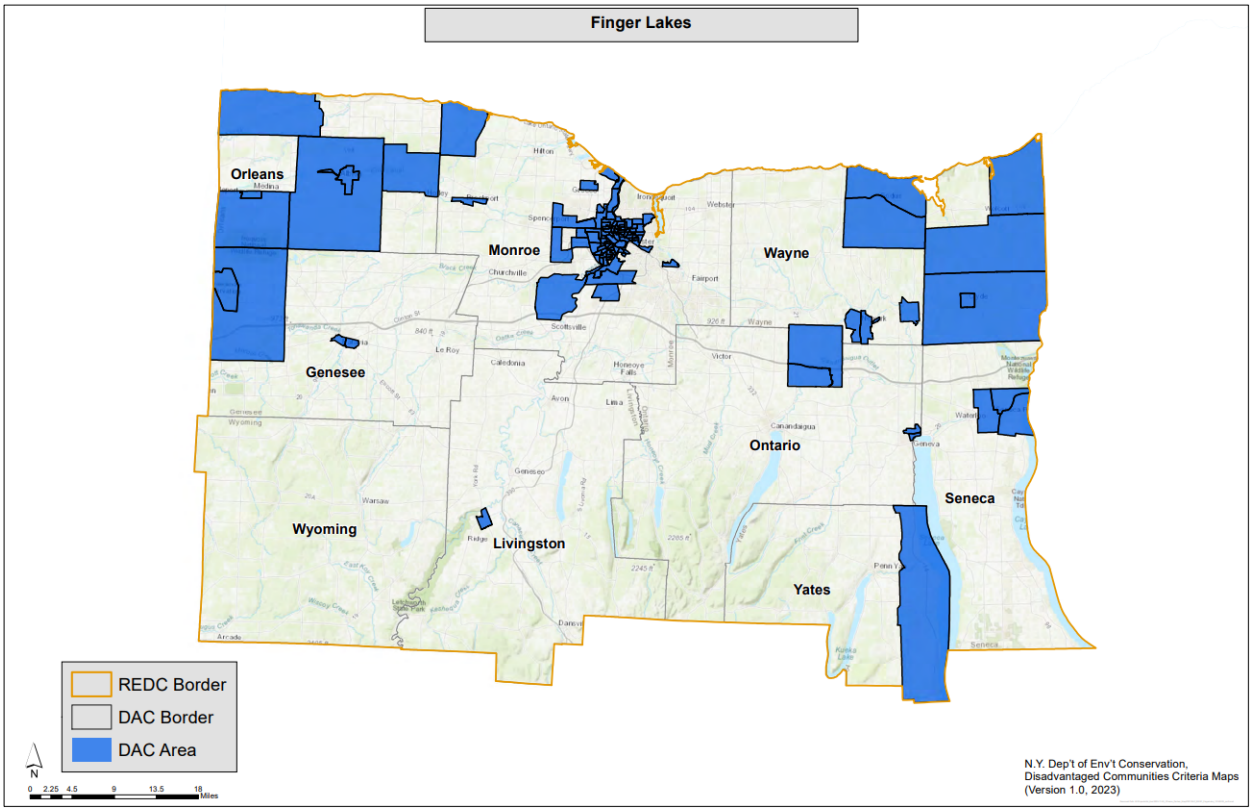
Figure 3-1: DAC Considerations Grouping



3.1. Spatial Data

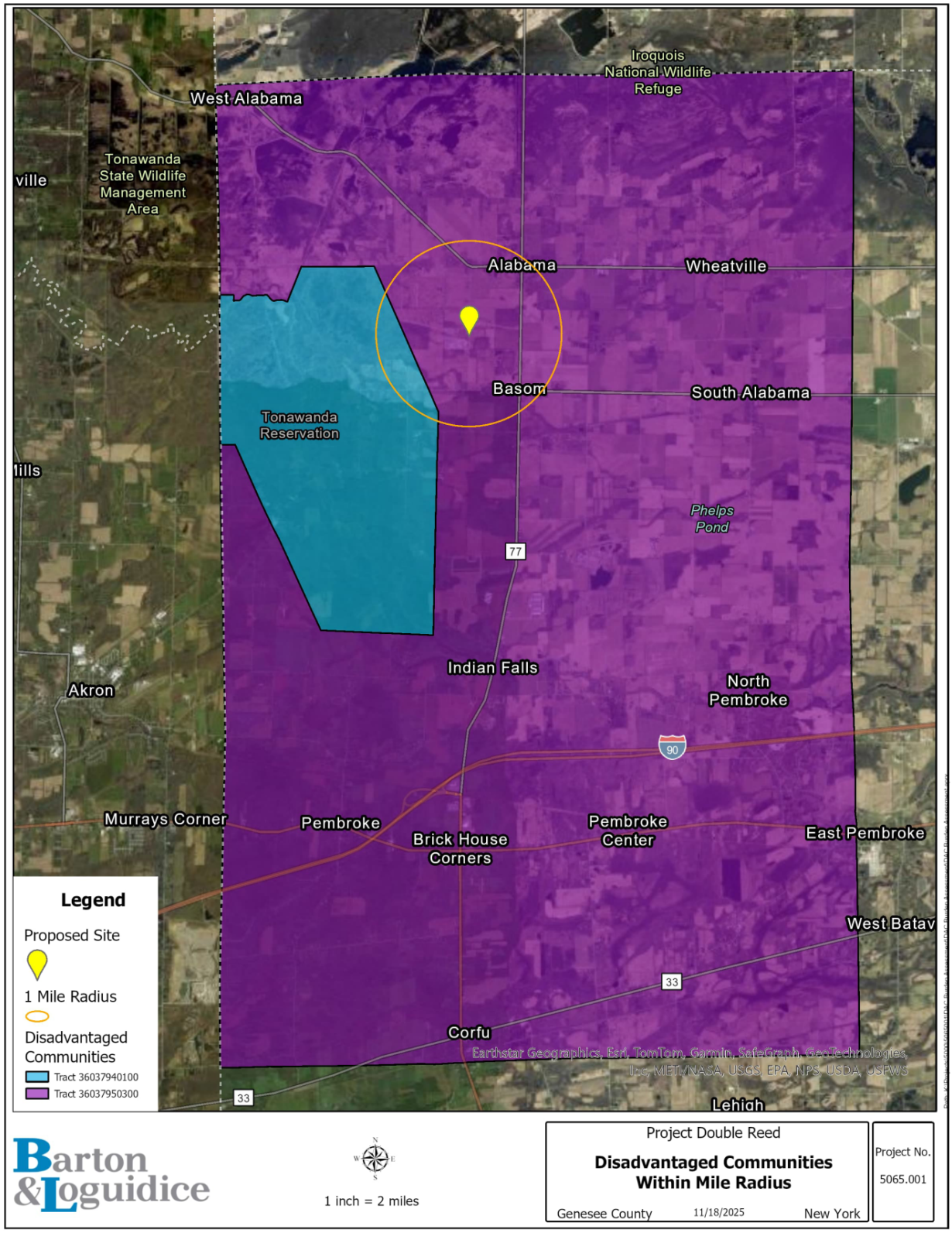
Figure 3-2 shows the DACs that the CJWG has identified within the Finger Lakes region.

Figure 3-2: Finger Lakes Region DACs



Project Double Reed is located in Census Tract 36037950300, which has a population of 6,046 and has been designated as a DAC by the CJWG. While DEP 24-1 references a 0.5-mile radius, a conservative 1-mile radius has been employed. Within a one-mile radius of the proposed site, one additional Census Tract has also been identified as a DAC: Census Tract 36037940100, which has a population of 458. Figure 3-3 shows the areas included in Census Tracts 36037950300 and 36037940100. It should be noted that 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.

Figure 3-3: DACs Within One Mile of Project Double Reed Site



3.2. Census Tract 36037950300 Baseline Data

Table 3-1 outlines the baseline data and risk factors for Census Tract 36037950300.

Table 3-1: Census Tract 36037950300 Indicator Percentiles

Environmental burdens and climate change risks	
Potential pollution exposures	
Vehicle traffic density	15.1
Diesel truck and bus traffic	86.6
Particulate matter	40.1
Benzene concentration	10.0
Wastewater discharge	39.7
Land use and facilities	
Proximity to remediation sites	57.4
Proximity to regulated management plan sites	25.6
Proximity to major oil storage facilities	0.0
Proximity to power generation facilities	0.0
Proximity to active landfills	0.0
Proximity to municipal waste combustors	0.0
Proximity to scrap metal processors	96.5
Industrial/manufacturing/mining land use	44.6
Housing vacancy rate	48.9
Potential climate change risks	
Extreme heat projections	48.1
Projected flooding in coastal and tidally influenced areas	0.0
Projected flooding in inland areas	0.0
Low vegetative cover	8.4
Agricultural land	95.3
Driving time to hospitals and urgent/critical care	94.6

Population characteristics and vulnerabilities	
Income	
Percent <80% of area median income	32.1
Percent below federal poverty line	44.8
Percent without a bachelor's degree	73.0
Unemployment rate	62.9
Percent of single-parent households	33.7
Race and ethnicity	
Percent Latino/a or Hispanic	3.9
Percent Black or African American	30.6
Percent Asian	4.3
Percent Native American or Indigenous	73.5
Limited English proficiency	8.0
Historical redlining score	No Data
Health outcomes and sensitivities	
Asthma emergency department visits	27.3
COPD emergency department visits	81.8
Heart attack (MI) hospitalization	84.7
Premature deaths	73.7
Low birthweight	53.3
Percent without health insurance	50.1
Percent with disabilities	72.8
Percent of adults age 65+	67.8
Housing mobility and communications	
Percent renter-occupied homes	26.8
Rental housing cost burden	13.6
Energy poverty or cost burden	82.5
Manufactured homes	60.8
Homes built prior to 1960	40.2
Percent without internet	54.9

3.3. Census Tract 36037940100 Baseline Data

Table 3-2 outlines the baseline data and risk factors for Census Tract 36037940100.

Table 3-2: Census Tract 36037940100 Indicator Percentiles

Environmental burdens and climate change risks	
Potential pollution exposures	
Vehicle traffic density	1.1
Diesel truck and bus traffic	0.0
Particulate matter	41.6
Benzene concentration	10.8
Wastewater discharge	29.8
Land use and facilities	
Proximity to remediation sites	0.0
Proximity to regulated management plan sites	29.8
Proximity to major oil storage facilities	0.0
Proximity to power generation facilities	0.0
Proximity to active landfills	0.0
Proximity to municipal waste combustors	0.0
Proximity to scrap metal processors	0.0
Industrial/manufacturing/mining land use	0.0
Housing vacancy rate	0.9
Potential climate change risks	
Extreme heat projections	17.7
Projected flooding in coastal and tidally influenced areas	0.0
Projected flooding in inland areas	0.0
Low vegetative cover	1.0
Agricultural land	68.3
Driving time to hospitals and urgent/critical care	95.1

Population characteristics and vulnerabilities	
Income	
Percent <80% of area median income	74.3
Percent below federal poverty line	61.3
Percent without a bachelor's degree	96.3
Unemployment rate	0.0
Percent of single-parent households	50.4
Race and ethnicity	
Percent Latino/a or Hispanic	12.4
Percent Black or African American	0.0
Percent Asian	38.8
Percent Native American or Indigenous	99.9
Limited English proficiency	45.3
Historical redlining score	No Data
Health outcomes and sensitivities	
Asthma emergency department visits	27.3
COPD emergency department visits	81.8
Heart attack (MI) hospitalization	84.7
Premature deaths	73.7
Low birthweight	53.3
Percent without health insurance	92.1
Percent with disabilities	96.4
Percent of adults age 65+	95.0
Housing mobility and communications	
Percent renter-occupied homes	40.3
Rental housing cost burden	0.0
Energy poverty or cost burden	99.8
Manufactured homes	98.9
Homes built prior to 1960	34.3
Percent without internet	98.4

4.0 Disadvantaged Communities Burden Analysis

According to the CJWG's data and analysis, Census Tract 36037950300 exceeds the state median for several environmental burden and climate risk indicators. These include diesel truck and bus traffic (86.6%), proximity to remediation sites (57.4%), proximity to scrap metal processors (96.5%), agricultural land use (95.3%), and driving time to hospitals (94.6%). These indicators were considered in the DGEIS and are further discussed below. Additionally, the project is not expected to result in any increase in traffic and the project anticipates that the local emergency services will be able to handle this development. Further information detailing these assessments is provided below.

Traffic:

Project Double Reed is expected to generate a limited amount of traffic, primarily from employee vehicle trips. The data center buildings are expected to be staffed 24/7 with three eight-hour shifts daily. Nighttime shifts typically have lower staffing levels compared to daytime shifts, which is expected to result in a proportionally lower PM Peak Hour generation. Furthermore, most of these trips will be from passenger vehicles, with heavy-duty vehicle traffic for deliveries and maintenance being infrequent. In typical operation, heavy duty vehicle traffic is anticipated to be limited to 6-8 deliveries a day.

Based on the *ITE Trip Generation Manual, 12th Edition*, the traffic impact analysis will apply **Land Use Code 160** – **Data Center**, as it provides multiple recent data points for trip generation. The estimated site-generated trips during the generator peak hours are as follows:

- **North Campus:**
  - AM Peak Hour: **130 trips**
  - PM Peak Hour: **115 trips**
- **South Campus:**
  - AM Peak Hour: **65 trips**
  - PM Peak Hour: **58 trips**

Total for Entire Site:

- AM Peak Hour: **195 trips**
- PM Peak Hour: **173 trips**

Tables 1 and 2 present the detailed trip generation calculations for the North Campus and South Campus, respectively.

Table 1: North Campus Trips				
ITE Code	160 - Data Center			
Number of 1000 Sq Ft GFA	1,439			
Peak Hour	AM		PM	
Trip Generation Rate	0.09		0.08	
Total Number of Trips	130		115	
Trips	Enter	Exit	Enter	Exit
Directional Distribution	75%	25%	35%	65%
Number of Trips per Direction	97	33	40	75

Table 2: South Campus Trips				
ITE Code	160 - Data Center			
Number of 1000 Sq Ft GFA	720			
Peak Hour	AM		PM	
Trip Generation Rate	0.09		0.08	
Total Number of Trips	65		58	
Trips	Enter	Exit	Enter	Exit
Directional Distribution	75%	25%	35%	65%
Number of Trips per Direction	49	16	20	38

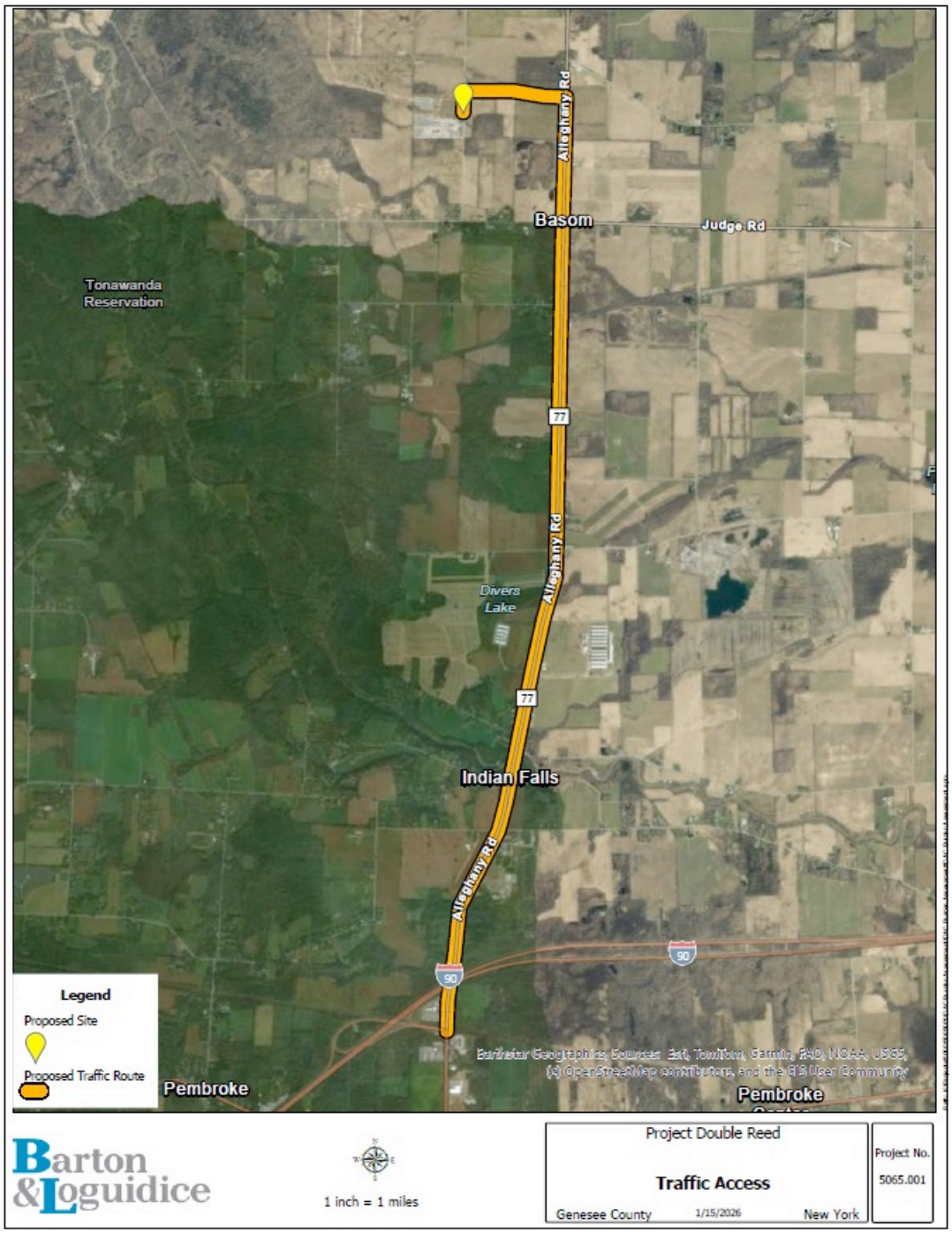
In conclusion, the traffic analysis indicates that Project Double Reed's contribution to overall park traffic is minor. While the STAMP 2016 EIS Update established a threshold exceeding 1,900 PM Peak Hour trips for the full, 1,262-acre STAMP park build-out, the present development is projected to generate only 173 PM Peak Hour trips. This means Project Double Reed accounts for approximately 9.0% of the cumulative traffic volume analyzed in the EIS.

The STAMP Master Plan envisions a bypass road connecting Stamp Drive to Crosby Road near Route 77. To accommodate this future connection, the intersection of Crosby Road and Route 77 is slated for reconstruction into a roundabout. While this intersection currently doesn't pose significant traffic concerns, a roundabout would address geometric challenges and enhance traffic flow. Roundabouts are proven to significantly reduce accidents compared to traditional intersections. The location of our project and anticipated improvements to Crosby Road will be coordinated closely with these future improvements.

It's important to note that most STAMP-related traffic is anticipated to originate and terminate near I-90, south of the site. Consequently, the impact of STAMP traffic on the Crosby Road and Route 77 intersection is expected to be negligible. In addition, the

impact of the STAMP traffic, including Project Double Reed, will not negatively impact the Tonawanda Seneca Nation or Census Tract 36037940100. As previously reported, the majority of the traffic will come from the south utilizing the New York State Thruway (I-90) to Route 77 to Stamp Drive to Crosby Road as shown on Figure 4-1. It is very unlikely that traffic associated with Project Double Reed will traverse the Tonawanda Seneca Nation or Census Tract 36037940100. Traffic associated with the project is expected to have a negligible impact on the Disadvantaged Community Census Tract 36037950300. The expected traffic routes prioritize high-capacity corridors, routing the majority of vehicles via the New York State Thruway and Route 77. By utilizing these established state highways, the project minimizes additional volume on local residential roads and ensures existing regional infrastructure handles the primary flow."

Figure 4-1: Traffic Access



Remediation Sites and Scrap Metal Processors

These factors are not applicable to Project Double Reed as they will not be further impacted by this project.

Agricultural Land Use

The DGEIS considered that the full build-out of STAMP would result in the loss of approximately 615 acres of agricultural lands, about 46% of the total 1,337.20-acre Project Site. Based on available information, approximately 950 acres of the STAMP site were being used for farming prior to 2011. The DGEIS further stated the potential loss of future agricultural use at the STAMP Site represented less than 1% of the total cropland acres located in Genesee County, and approximately 1.7% of total cropland acres located in Ag District No. 2. The impact of which would be far outweighed by the economic development spurred by STAMP. The maximum amount of land considered for development of the proposed Project Double Reed is 135 acres, which remains well below (<10%) the contemplated full build-out under the DGEIS. The DGEIS stated that approximately 148,584.3 acres of cropland was located in Genesee County, so the 135-acres associated with Project Double Reed account for less than 0.08% of the total located in Genesee County. Accordingly, Project Double Reed would not have any significant adverse impacts on agricultural land resources that were not analyzed in the STAMP DGEIS.

Emergency Services:

The project team initiated outreach to the following local emergency service providers to foster collaboration and ensure effective emergency response. The goal of these initial outreach efforts is to inform these agencies about the project scope, understand their current level of service capabilities, and establish strong working relationships.

Genesee County Sheriff's Office

On January 23, 2026 the project team met with Genesee County Sheriff Joseph Graff. This session was a follow-up to prior project briefings, intended to confirm that the Sheriff's Office remains fully informed of the project's evolution. Sheriff Graff reaffirmed his understanding of the project's size and scope, specifically noting that while the project is substantial, the potential for increased calls related to commercial traffic and expanded patrol areas is possible.

To ensure the project maintains a "minimal impact" on county law enforcement resources, the following components of the project act as primary mitigations for the Sheriff's focus areas:

- **Traffic Management:** To mitigate the potential for traffic-related calls from increased commercial vehicle volume, the site features a permanently staffed security booth with dedicated 'rejection' pathways. This team is tasked with directing visitors and commercial traffic, ensuring that ingress and egress remain fluid and do not impact public roadway safety.
- **Proactive Site Security:** To prevent the need for additional county patrol areas, the project utilizes a private, 24/7 security presence. This team provides around-the-clock monitoring of the site, which is fully fenced and supported by advanced camera systems and early-detection technology.

- **Internal Incident Response:** By maintaining a secure, monitored perimeter and on-site staff, the facility is designed to manage routine security and traffic oversight internally, thereby avoiding an increase in law enforcement dispatch requests.

The following exhibit demonstrates the geographic proximity of these emergency services to the project site, showcasing distances in both miles and estimated drive times.

Location Exhibit:

Alabama Volunteer Fire Department

The project team has maintained engagement with the Town of Alabama Fire Department regarding the STAMP site. This dialogue began with the initial project phase and has been sustained through subsequent interim updates. On January 21, 2026, the team provided an updated project brief to Chief Terry Thompson to address specific requests for information regarding the current development's scale and hazards.

Chief Thompson confirmed his ongoing understanding of the project's scope. This consultation included a review of the following details, which formed the technical basis for the Department's determination that the project will not adversely impact emergency service levels:

- **Infrastructure & Hazards:** The specific configuration of Uninterruptible Power Supply (UPS) battery backups and diesel-powered generators. The Chief identified no "unusual hazards" associated with these systems.
- **Access Design:** The inclusion of integrated stair towers, which the Chief noted will significantly assist personnel with emergency access and vertical movement within the facility.

- **Operational Impact:** An assessment of call volume, which is expected to increase only by a "negligible amount**,"** primarily for false alarms or EMS support.

Chief Thompson indicated that the Department feels they currently possess adequate equipment to respond to site emergencies, supplemented by participating fire companies through established mutual aid agreements.

The Alabama Volunteer Fire Department has Emergency Support Facilities at the following locations, within 2–6-minute drive time of the proposed development, with support apparatus split between the two locations:

- Fire Station 1 – 2230 Judge Road
    - Engine 1 – International 4900
    - Tanker 5 – International
- Fire Station 2 – 1717 Lewiston Road
    - Engine 2 – Spartan Metro Star
    - Squad 4 – 2015 Ford Expedition
    - Rescue 19 – International 4900 Rescue Walk In

The following exhibit demonstrates the geographic proximity of these emergency services to the project site, showcasing distances in both miles and estimated drive times.

Location Exhibit

Mercy Flight EMS

The project team has maintained ongoing consultation with Mercy Flight EMS to evaluate potential impacts on emergency services resulting from the construction and operation of the proposed development. This dialogue builds upon previous outreach

conducted for the prior project version; the team has since reaffirmed project details with Mercy Flight to account for the updated scope and scale

On January 22, 2026, the project team met with Scott Wooton (CFO) and Mike Gugliuzza (Director of Medical Operations). Having been briefed on both the previous and current iterations of the site, both representatives confirmed a full understanding of the project's expanded size and technical requirements.

- **Basis of Determination:** The team provided technical specifications on site density and infrastructure, allowing Mercy Flight to determine the facility poses "no significant risks" once operational.
- **Risk Profile:** Feedback indicated that while the construction phase carries the standard elevated risks associated with large-scale builds, Mercy Flight maintains sufficient resources to manage these contingencies. Once operational, the health and safety risks are considered negligible due to the low-occupancy nature of data center halls. This low-risk profile is driven by Stream Data Centers' Emergency Response Protocols, which utilize 24/7 on-site staffing, specialized Methods of Procedure (MOP) for electrical safety, and advanced detection systems to resolve issues before external intervention is required.
- **Future Coordination:** As part of this ongoing consultation, the project team will provide and coordinate the final, site-specific Emergency Action Plan (EAP) with Mercy Flight EMS to ensure their flight and ground crews are fully integrated with the facility's safety protocols.

Mercy Flight EMS provides comprehensive local coverage via ground ambulance and air ambulance services. Their air ambulance base is located at the Genesee County Airport, positioned within 0.5 miles of their ground service station, allowing for rapid mobilization to the project site.

Response capabilities are further bolstered by a tiered mutual-aid system including Alabama Volunteer Fire Department which provides essential Emergency Medical Services and collaborates closely with Mercy Flight on regional dispatch calls.

Location Exhibit:

Genesee County Office of Emergency Management
On January 21, 2026, the project team conducted a follow-up consultation with Timothy Yaeger, Director of the Genesee County Office of Emergency Management. The project team provided an updated scope to Director Yaeger, ensuring that the agency's assessment is based on the most current site designs and technical specifications.

Director Yaeger confirmed that the Office does not see any 'unusual hazards' associated with the project. While data centers involve specific risks—primarily related to electrical equipment and fuel storage—the agency noted that these are well-understood industrial risks. The project is viewed as low risk, with the most likely calls for service involving routine EMS assistance for employees or standard traffic management rather than specialized industrial emergencies.

Response capabilities are bolstered by a tiered mutual-aid system, ensuring the facility is protected by both local and regional assets:

- **Local EMS & Coordination:** The Alabama Volunteer Fire Department provides essential Emergency Medical Services (EMS) and works in close collaboration with Mercy Flight on regional dispatch calls, ensuring rapid air-medical transport if required.
- **Specialized Fire Suppression:** It is our understanding that the STAMP site is covered by a mutual aid network capable of deploying specialized foam apparatus. These units are specifically designed to suppress Class B fires (flammable liquids) and high-voltage electrical fires, providing a critical layer of protection for the facility's power infrastructure and fuel storage.
- **Integrated Readiness:** This combination of dedicated local EMS and regional industrial firefighting resources ensures a comprehensive response to both routine medical needs and specialized technical incidents.

The determination that the project will have no significant impact on emergency service levels is based on the director's review of the following updated project details:

- **Operational Training and Preparedness:** Stream Data Centers' Emergency Response Protocols, which utilize 24/7 on-site staffing, specialized Methods of Procedure (MOP) for electrical safety, and advanced detection systems to resolve issues before external intervention is required.
- **Design Mitigations:** The inclusion of stair towers, which Director Yaeger specifically noted would significantly aid emergency personnel in gaining access to the facility during an incident.
- **Resource Adequacy:** The Director confirmed that the Town of Alabama and its mutual aid network are sufficiently equipped to support the facility's operations.

Town of Alabama

In addition to the above outreach, the Town of Alabama responded to a request from the Genesee County Economic Development Center on February 28, 2025, following a January 30, 2025, letter from the Tonawanda Seneca Nation, which expressed concern that emergency services would be inadequate to support a data center project at STAMP. The Town of Alabama reiterated that a detailed Emergency Plan must be submitted to the Town for any large projects, which will be evaluated by both the Alabama Fire Department and the Town as part of the site plan review process. They further noted that the Alabama Fire Department maintains specialized firefighting equipment, including a foam suppression truck. Currently, the only fire departments in this area with this specialized capability are those of Barre, Shelby, and Alabama. The Town further stated "To ensure readiness for any potential incidents, a foam task force has been established, consisting of the three fire departments, along with the New York State Division of Homeland Security and Emergency Services, as well as Genesee and Orleans County Emergency Services. These agencies collaborate and train together to ensure effective response capabilities." Based on this correspondence as well as the other outreach efforts, adequate emergency services are available for Project Double Reed.

<u>Acoustic Impacts:</u>

Although not identified as an environmental burden, Project Double Reed is committed to minimizing noise impacts on surrounding areas and aligning the proposed development with STAMP's intended uses. To this end, noise modeling was developed to predict potential noise levels from the facility. The full report was completed in February 2026, by Ramboll.

Modeling was performed using Cadna/A software implementing ISO 9613-2 environmental sound propagation algorithms. The assessment accounts for distance attenuation, barrier effects from buildings/topography, and atmospheric absorption.

Operational Acoustic Scenarios
For facilities of this type, the typical operational acoustic profile is covered by three main scenarios:

- **Peak Operations** This represents the facility's typical 24/7 operational profile.
- **Generator Maintenance:** A periodic scenario involving the testing of a limited number of generators during daytime hours for short durations, in conjunction with the equipment operating under the Constant Mechanical profile.
- **Emergency Backup:** An emergency scenario where all generators are operational, this is anticipated to be extremely infrequent, maybe once or twice every 3 to 5 years for short durations based on the reliability of the supporting grid infrastructure. As such, this impact is typically not considered when completing detailed noise models as the events are extremely infrequent and typically of a short duration when they do occur.

Integrated Design Measures
Compliance is achieved through primary architectural and engineering controls integrated into the site plan:

- **Rooftop Screening:** Each of the three data centers (housing 66 chillers each) includes full-perimeter solid rooftop screens extending 20 feet above the roofline (62 feet total height) to mitigate chiller noise.
- **Generator Barriers:** Ground-level generator yards include solid noise barriers—30 feet high for the South Campus and 20 feet high for the North Campus.
- **Operational Tuning:** Chillers are programmed to operate at reduced fan speeds (55%) during nighttime hours to further minimize the acoustic footprint.

Sound Measurement Methodology
Regulatory compliance is based solely on dBA noise levels, which are designed to reflect how the human ear perceives sound across different frequencies. Since the governing standard does not reference dBC levels or require evaluation of low-frequency noise through the C-weighting scale, there is no obligation to assess dBC as part of demonstrating compliance.

The key findings of the environmental noise assessment were as follows:

- No independent state, county or town numerical noise limits apply to the Site. However, the STAMP GEIS/Findings established maximum noise levels of 65 dBA during the day, and 45 dBA during the night at the STAMP boundary in non-industrial areas, which are treated as the controlling criteria for this assessment.
- Project generated noise levels at the proposed Projects property boundaries are expected to remain below 65 dBA during the day and 45 dBA during the night.
- Noise levels during a Day/Night Constant Mechanical operating scenario are projected to be consistent with the GEIS/Findings.

- Noise levels during a Generator Maintenance operating scenario are projected to be consistent with the GEIS/Findings. Generator Maintenance testing is to be undertaken during daytime hours.
- Noise levels during a Day/Night Emergency operating scenario are projected to be consistent with the GEIS/Findings

Based on the findings of the noise assessment and modeling and the use of the GEIS/Findings for the STAMP project, Project Double Reed is not anticipated to impact the nearby residential receptors or the Tonawanda Seneca Nation and therefore, will not have any disproportionate burden.

Air Emissions:
Although not identified as an environmental burden, Project Double Reed is committed to minimizing air impacts on surrounding areas and aligning the proposed development with STAMP's intended uses. The project's primary source of air emissions will be stationary diesel backup generators. The facility will install up to twelve (12) Tier 2 certified diesel backup generators rated at 2.7 megawatts (MW) each. These generators will be operated infrequently. Multiple control devices have been incorporated into the process design to reduce emissions as much as possible in the limited instances when the generators need to operate. Furthermore, maintenance testing on the units will be conducted in a staggered manner to reduce any short-term impacts on emissions.

Regulatory Compliance and Permitting
Conservatively estimating the project's size and operational characteristics, it will not require permitting under Title IV (Acid Rain Program) or Title V (Operating Permits) of the Federal Clean Air Act. However, the project will be subject to state-level oversight through a New York State Air State Facility (ASF) Permit with the NYSDEC for up to twelve emergency generators. The generators will be equipped with Miratech emissions control technology. This allows the units to meet EPA Tier 4 exhaust standards (40 CFR Part 1039 Subpart B) for Oxides of Nitrogen (NOx), Volatile Organic Compounds (VOC), and Particulate Matter (PM). As emergency generators, operations will be limited in accordance with 6 NYCRR Part 200.1(cq).

Operational Maintenance and Limits

Generators require regular maintenance to ensure emergency readiness. While the probability of continuous operation during a utility outage is low given the project's connection to high-reliability, high-voltage infrastructure the generators will be regularly tested via short-duration operation to guarantee performance.

- **Operational Limits:** The facility is requesting an enforceable limit of 500 hours per year per unit. This covers all categories, including a one-time commissioning event (typically <20 hours), monthly maintenance runs (15–30 minutes), and an annual load test (2–4 hours).
- **Federal Restrictions:** In addition to the 500-hour site limit, the engines must comply with **NSPS Subpart IIII,** which restricts reliability-related activities (maintenance and testing) to no more than 100 hours per year per engine.
- **Monitoring:** To ensure transparency and accuracy, each engine will be equipped with a non-resettable hour meter. Run times will be recorded at the beginning and end of every operation to establish an indisputable log of usage.
- **Continuous Compliance:** Stream Data Centers will submit a formal Operation and Maintenance (O&M) Plan and a compliance certification within 365 days of the permit's effective date to guarantee the equipment remains properly maintained and compliant with all air quality requirements. The emission control systems will be operated in accordance with the submitted O&M Plan. The plan will describe key system operating parameters (such as temperatures, pressures, and/or flow rates) necessary to demonstrate equipment functionality and compliance, including proposed monitoring and recording of such parameters at a specified frequency. The plan will also describe in detail procedures to maintain the approved emission control system, including the manufacturer-recommended maintenance and inspection schedules.

Estimated Annual Emissions (Total Campus)

Pollutant	Project Estimated Emissions (Projected Actual)*	STAMP DGEIS / Major Source Threshold
Oxides of Nitrogen (NOx)	**~1.2 tpy**	100 tpy (DGEIS Impact Threshold)
Carbon Monoxide (CO)	**~6.2 tpy**	100 tpy
Particulate Matter (PM_{10}/$PM_{2.5}$)	**<0.1 tpy**	100 tpy
Volatile Organic Compounds (VOC)	**~0.34 tpy**	50 tpy
Sulfur Dioxide (SO_2)	**< 0.1 tpy**	100 tpy
Hazardous Air Pollutants (HAPs)	**< 0.1 tpy**	25 tpy (Aggregate) / 10 tpy (Individual)
Greenhouse Gases (CO_2e)	**1,164 tpy**	25,000 metric tons (Reporting Threshold)

* Emissions shown are based on 50 hours of projected actual run time per generator per year and have been estimated using Kohler KD2500A (KD62V12A) engine specifications and Miratech control technology specifications.

Diesel generators do not emit perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), or sulfur hexafluoride (SF_6).

Project Double Reed's proposed design shows a demonstrated commitment to reducing reliance on fossil fuels through the minimization of fossil fuel backup power resources. Further, the Project will draw power from the STAMP substation, which itself is interconnected to the Western New York power grid (NYISO Zone A) which, according to 2024-2025 NYISO data, is consistently low-emission, drawing from 85% to 95% renewable rather than non-renewable sources.

Water Pollutants:

Although not identified as an environmental burden, Project Double Reed is committed to minimizing water impacts on surrounding areas and aligning the proposed development with STAMP's intended uses. To this end, Project Double Reed will be required to obtain coverage under a SPDES General Permit for Construction for Stormwater Discharges from Construction Activity to support construction activities. The project design includes four (4) stormwater management facilities on the South Campus. Three (3) were approved as part of the prior development approval plus a dry swale. This site has been evaluated for and complies with the drainage requirements of the NYSDEC New York State Stormwater Management Design Manual and SPDES General Permit for Stormwater Discharges from Construction Activity.

The North Campus will be provided with twelve (12) post-construction stormwater management practice facilities and will maintain stormwater discharges to four (4) existing points of discharge from the property. These proposed stormwater facilities include filtration bioretention facilities and a micropool extended detention pond to meet the requirements of the NYSDEC State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activity for new development.

The site is tributary to Whitney Creek, which is identified as being in the HUC-12/HUC-8 of Oak Orchard Creek. It is noted that there are other documents previously submitted for the overall STAMP project that indicate that these 2 sites are tributary to Tonawanda Creek. The sites are provided with compliant stormwater management facilities for water quality controls as well as runoff controls. Runoff from these sites once it is discharged from the properties, flows into wetland complexes in the western portion of STAMP. Regardless, the 90 acres associated with this development represent 0.40% of the entire HUC-12 watershed and will have a negligible effect on water quality.

Ecological Impact and Mitigation Narrative:

Spatial Relationship and Site Characterization

The project is sited within the established STAMP industrial area, leveraging a landscape already modified by agricultural activity, utility infrastructure, and active industrial footprints. The North Campus and South Campus maintain setbacks of approximately 3,500 feet (0.66 miles) and 2,000 feet (0.38 miles), respectively, from the Tonawanda Seneca Nation territory boundary. This physical separation, combined with the concentration of development on previously disturbed parcels, minimizes encroachment into high-value habitats.

Technical Design Controls
To mitigate operational impacts related to noise, light, and avian safety, the project incorporates the following environmental design standards:

- Acoustics: Adherence to STAMP DGEIS thresholds, limiting sound levels to 65 dBA (day) and 45 dBA (night) at property boundaries.

- Lighting: Installation of Dark Sky compliant fixtures to eliminate upward light scatter and prevent the disorientation of nocturnal wildlife.

- Avian Safety: Integration of bird-safe glazing on all facility facades to reduce the frequency of avian strikes, particularly for migratory species.

- Hydrology: Implementation of comprehensive stormwater management systems to prevent direct impacts on surface waters and associated riparian habitats.

Regulatory Compliance and Species Protection
Site-specific reviews conducted in November 2025 confirmed that the project parcels lack the dense woodlands or large water bodies required by the bald eagle or sensitive bat species (Northern long-eared and Tricolored). While potential habitat for the short-eared owl and northern harrier exists, the project remains in full compliance with the existing STAMP Net Conservation Benefit Plan and Incidental Take Permit overseen by the NYSDEC.

This plan ensures the permanent protection and restoration of winter raptor habitat. Furthermore, project impacts on the monarch butterfly are categorized as negligible under the anticipated federal 4(d) rule. Consequently, the development maintains a "no-detriment" status regarding state and federally listed species through adherence to established regulatory frameworks.

5.0 Proposed Project Burden Analysis

As discussed in the previous sections, the Proposed Project would not place a disproportionate burden on any disadvantaged community. Additionally, the operation of Project Double Reed yields significant benefits for the local host community and nearby DACs.

The development of this data center will significantly contribute to the local economy. It will generate substantial investment in construction and critical infrastructure, creating numerous skilled, high-paying jobs in technical and support roles. This includes permanent positions for skilled trade professionals to maintain critical equipment, oversee IT support, and provide physical security and day-to-day assistance in office-like environments. The project is expected to sustain a workforce of approximately 120 employees. Data centers are a valuable asset to local communities, generating substantial revenue without placing a significant burden on public services.

5.1 DAC Benefits

Project Double Reed has demonstrated that it has the experience and financial capabilities to execute, develop, and deliver its project in a timely manner. It is backed by a proven developer with an impressive client base and a multitude of similar projects under its belt. In addition, Project Double Reed has a soft commitment from a Fortune 50 company to utilize 100% of the data center capacity.

The development of Project Double Reed will significantly contribute to the local economy. Through a revised capital investment to increase by more than 60% from prior filings, in construction and critical infrastructure, the development will generate high-paying jobs in technical and support roles. Project Double Reed will pay sales tax and property taxes, which will be allocated to Genesee County, the Town of Alabama, and its school district on an annual basis, subject to an escalator that will result in a sizable payment being paid on an annual basis at the end of the PILOT for the project. It is anticipated that this revenue will have a critical impact on the County's ability to undertake vital updates to the county's infrastructure, thereby improving the health and welfare of all members of the community. In addition, Project Double Reed will pay to finance construction of the STAMP Substation and to reimburse GCEDC for costs associated with prior investment made to the same, while also paying GCEDC for the 90 acres it will purchase for the Project.

Project Double Reed will have the smallest environmental impact and will best address concerns voiced by the Territory of the Tonawanda Seneca Nation with respect to visual and noise impacts, all while providing local benefits over the life of the PILOT.

Project Double Reed will play a critical role as a tenant of the STAMP Site in supporting the overall goals of the development of STAMP and the positive impacts that will result

for existing businesses and other economic development projects. Further, the financial benefits to the community will be utilized to fund infrastructure improvements throughout the County which will benefit economic development projects (both existing and future) as well as the community at large.

6.0 Public Participation

Project Double Reed prepared an enhanced Public Participation Plan (PPP) to fulfill and comply with NYSDEC requirements and also to help ensure meaningful and effective public participation for stakeholders to be informed about and involved during the environmental review of the Proposed Project. The PPP has been prepared under separate cover and will be reviewed and approved by NYSDEC prior to implementation. Public participation will be recorded and documented in accordance with the PPP. These outreach efforts will be in addition to any notice and publication requirements required by law.

7.0 Conclusion

Project Double Reed has demonstrated a consistent commitment to complying with the requirements of SEQRA and the EJ Siting Law, and ensuring that the project will not place a disproportionate burden on any disadvantaged community. Through this evaluation, several key components underscore the Facility's adherence to environmental standards and its proactive approach to mitigating potential impacts on DAC.

- **Job Creation:** Skilled, high-paying jobs that stimulate the local economy.
- **Significant Revenue:** Substantial tax revenue to support essential community services.
- **Community Pride:** Development that positions Genesee County as a hub for innovation and technology.

Stream has been at the forefront of the data center industry since its beginnings, transforming communities and driving economic growth. Project Double Reed's vision aligns seamlessly with the goals of the STAMP as the heart of the Buffalo-Rochester Tech Corridor. The proposed project possesses the financial capacity, technical expertise, and unwavering commitment to bring multi-billion-dollar projects to life, right here in Genesee County.

The findings of this DAC Evaluation affirm that Project Double Reed aligns with the principles of the EJ Siting Law, and ensuring that disadvantaged communities are protected and that the state's environmental and public health goals are advanced.