

MEMORANDUM

TO: Mark A. Masse, CPA | President & CEO, GCEDC

FROM: STAMP Tech Team: Andrew Kosa, P.E. | Civil Engineer, CPL; Katlyn Hojnacki, Senior Ecologist, CC Environment

DATE: March 11, 2026

RE: State Environmental Quality Review Act Process for Project Double Reed at the Western New York Science & Technology Advanced Manufacturing Park

1. Introduction

Clark Patterson Lee (“CPL”), CC Environment (“CCE”), along with Phillips Lytle LLP (collectively, the “Tech Team”), have reviewed the updated application documentation dated February 18, 2026 (“Updated Application”) relating to the data center project at STAMP (“Project Double Reed” or “Project”) proposed by Stream U.S. Data Centers, LLC (“Stream”) in conjunction with the impacts and thresholds for proposed STAMP tenants analyzed under the Generic Environmental Impact Statement (“GEIS”) prepared for STAMP. The Update Application was submitted in response to comments provided by the Tech Team in a memorandum dated January 5, 2026 (“Prior Memo”) regarding review of Stream’s initial application for the Project dated December 12, 2025.

The GCEDC is now evaluating Project Double Reed pursuant to the State Environmental Quality Review Act (“SEQRA”) to determine whether the potential adverse environmental impacts associated with Project Double Reed are adequately analyzed in the STAMP GEIS. This memorandum summarizes the Tech Team’s comments on the Updated Application. The format of this memorandum mirrors the format of the Updated Application.

2. Double Reed Project Description Inconsistencies

In order to complete the environmental review for the Project, there must be one single consistent Project description (impacts change as Project details change). A number of Project Description inconsistencies have been identified within the Updated Application.

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.

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.
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.
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.

3. Technical Summaries and Exhibits Comments

A. Architectural Massing and Elevations

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.

B. Visual Impact Analysis Technical Summary

1. 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.

C. Site Plans

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.

2. MP-1, Stormwater ponds on both site plans do not show discharge locations. Revise accordingly.
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.
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.
5. C-122-N, provide proposed substation details.
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.
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.
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.
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.
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
11. SP-1, South Campus, General Construction Notes, revise as noted above.
12. 10-Acre Logistics Area Layout, coordinate with National Grid for overhead power signage requirements.
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.

14. 10-Acre Logistics Area Layout, Stormwater Management and SWPPP will need to be prepared for this area.

D. Stormwater Technical Summary

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.
2. The provided stormwater management information explains that there are four outlet points for the stormwater management facilities on the North Campus which appear to be: (i) a small swale that extends towards the substation; (ii) an ephemeral drainage that begins north of Wetland 10 and flows across the farm fields and connects to the eastern portion of Wetland 4; (iii) an outlet into Wetland 10, which outlets into Tributary 2, and; (iv) an ephemeral drainage that extends from Crosby Road and funnels stormwater runoff to W10.
 - a. Please confirm or correct and provide specific outlet location marked on all Site Plans.
 - 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.
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.
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?

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?

E. Stormwater Plans

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?
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.

F. Photometric Plan

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.
2. Does the Photometric Plan include the proposed wall packs on the side of the data center buildings? If not please revise to include.
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.

G. Landscape Plan

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.
2. 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.
 - b. 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.

- c. Bio-Retention Seed Mix: Alkali grass (*Puccinellia distans*) is not native. Recommend replacing with switchgrass (*Panicum virgatum*) or red-topped panic grass (*Coelataenia rigidula*). Creeping bentgrass (*Agrostis stolonifera*) is not native. Recommend replacing with Autumn bentgrass (*Agrostis perennas*). Please revise accordingly.
3. LS-1.
- a. 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.
 - b. 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.

H. Traffic Technical Summary

- 1. Updated Application contradicts information in Matrix regarding number of heavy vehicle trips (2-3 vs. 6-8), clarify and correct.
- 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.

I. Utility Power Technical Summary

- 1. No comments at this time.

J. Utility Power Overall Infrastructure Concept

- 1. No comments at this time.

K. Backup Power Technical Summary

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.

L. Geotechnical Technical Summary

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.
2. What is the anticipated completion date for the geotechnical investigation currently underway for the Project?
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?
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.

M. USDA Soil Surveys

1. No comments at this time.

N. Air Emissions Technical Summary

1. Please note, the GCEDC may retain a separate Air Emissions consultant to fully review air emission materials. Thus, more comments may be forthcoming.

O. Acoustics Technical Summary

1. Please note, the GCEDC is retaining a separate noise consultant to fully review noise impacts materials. Thus, more comments may be forthcoming.

P. Emergency Services Confirmation Technical Summary

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.
2. Provide additional information on the uninterruptable battery storage systems proposed for the Project--the design and size, and their potential hazards.

3. Provide a site specific Emergency Action Plan as referenced in the Updated Application, or provide an analogous example.
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.

Q. Emergency Response Procedures Technical Summary

1. No comments at this time.

R. Disadvantaged Communities Burden Assessment

1. Traffic impacts need to be updated with additional truck trips provided in Traffic Technical Summary.
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.
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.
4. Summarize economic incentives and benefits pledged through financial assistance application with GCEDC.
5. Additional information on emergency response plans should be updated per any updates to those sections above.
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.

EAF Part 1 Form

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>

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.
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.
 3. **D.1.g. ii:** Building height details conflict with Site Plan figures. Correct/Confirm.

D.2 Project Operations

1. **D.2.b:** Will the Telecom Infrastructure encroach on the wetlands shown in the applicable concept map? If so, please clarify in EAF.
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.
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.
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.
5. **D.2.j.:** Update truck trips per above comment if applicable, and provide construction related vehicle trips.

E.1. Land Uses on and Surrounding the Project Site

1. **E.1.b.:** These land use and cover-type calculation appear to remain incorrect and must be revised.
 - a. 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.
 - b. 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.
 - c. 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.

E.2. Natural Resources on or Near Project Site

1. **E.2.h.:** As detailed above, consider existing hydrology, feeding existing drainage ways and wetlands offsite.

- 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.
 - b. Note any potential offsite stream/wetland impacts from regrading of the project site.
 - c. Will there be offsite wetland water supply impacts from site development?
2. **E.2.o.:** The heartleaf plantain and least bittern do not occur on the portion of the STAMP Site comprising the North and South Campuses. Please revise.
 3. **E.2.q.:** 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.

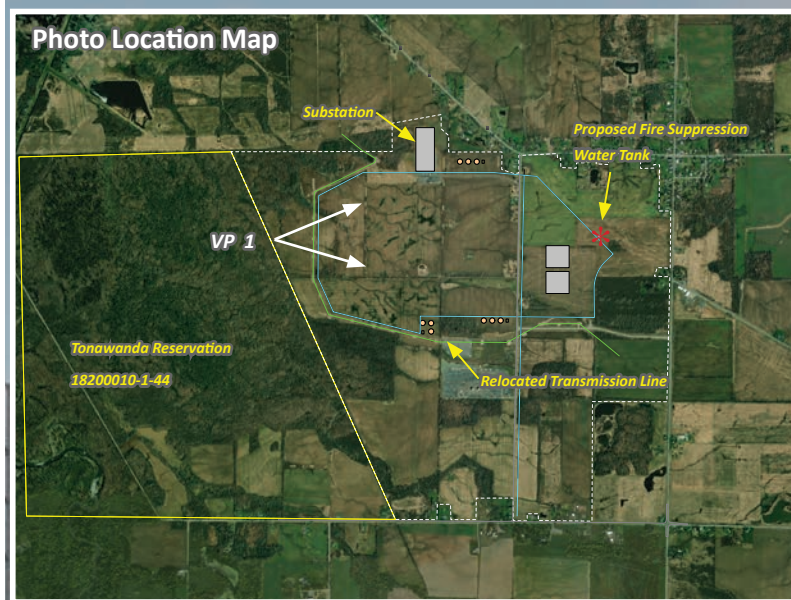
E.3 Designated Public Resources On or Near Project Site

1. **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.

Conclusion

The Tech Team recommends that Stream provide revised documentation addressing the above comments. Additionally, the Tech Team notes that we are in the process of retaining additional consultants on noise and air emissions such that additional comments on these materials may be expected in the future. We also understand that Stream is in the process of preparing a Phase Ia/Ib archaeological investigation report for the residential property on Crosby Road which Stream intends to acquire in connection with the project, review of which will commence upon receipt of same. Additionally, GCEDC is currently receiving public comments and may receive additional comments from involved and interested agencies. Thus, Stream should expect additional comments and requests for revisions as the SEQRA process moves forward.

Exhibit A



VISUALIZATION 1
SIMULATED EXISTING CONDITION - No Setback from STAMP/Nation's Territory Property Line

Figure 1

VISIBILITY ASSESSMENT
FIRE SUPPRESSION WATER TANK
WNY Science and Technology Advanced Manufacturing Park (STAMP)
Town of Alabama, Genesee County, NY



VISUALIZATION 1
SIMULATED CONDITION - No Setback from STAMP/Nation's Territory Property Line



View of Fire Suppression Tank Blocked by Intervening Vegetation
Distance to Tank - 1.35 Miles

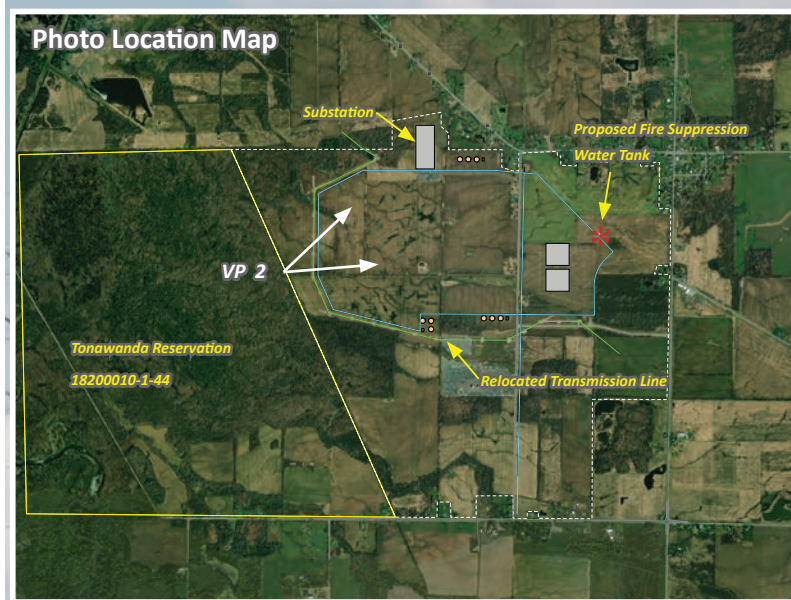
VISUALIZATION 1
SIMULATED CONDITION - No Setback from STAMP/Nation's Territory Property Line



VISUALIZATION 1
SIMULATED CONDITION - 100FT setback from STAMP/Nation's Territory Property Line



VISUALIZATION 1
SIMULATED CONDITION - 200FT setback from STAMP/Nation's Territory Property Line



VISUALIZATION 2
SIMULATED EXISTING CONDITION - No setback from STAMP/Nation's Territory Property Line



VISUALIZATION 2
SIMULATED CONDITION - No setback from STAMP/Nation's Territory Property Line



View of Fire Suppression Tank Blocked by Intervening Vegetation
Distance to Tank - 1.30 Miles

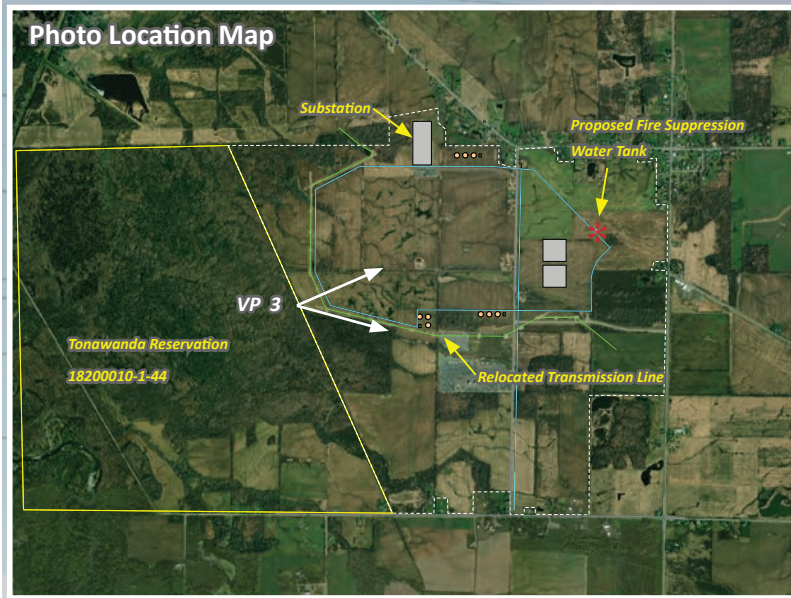
VISUALIZATION 2
SIMULATED CONDITION - No setback from STAMP/Nation's Territory Property Line



VISUALIZATION 2
SIMULATED CONDITION - 100FT setback from STAMP/Nation's Territory Property Line



VISUALIZATION 2
SIMULATED CONDITION - 200FT setback from STAMP/Nation's Territory Property Line



VISUALIZATION 3
SIMULATED EXISTING CONDITION - No setback from STAMP/Nation's Territory Property Line



VISUALIZATION 3
SIMULATED CONDITION - No setback from STAMP/Nation's Territory Property Line



View of Fire Suppression Tank Blocked by Intervening Vegetation
Distance to Tank - 1.25 Miles

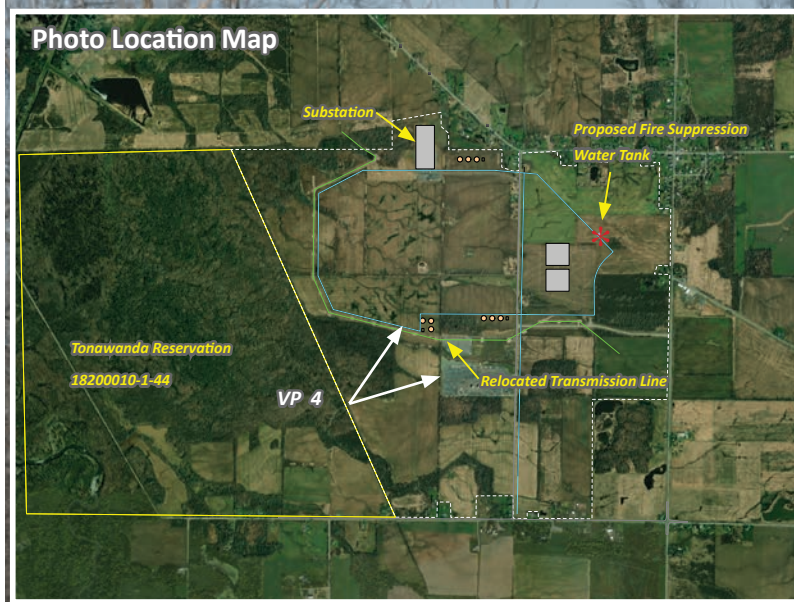
VISUALIZATION 3
SIMULATED CONDITION - No setback from STAMP/Nation's Territory Property Line



VISUALIZATION 3
SIMULATED CONDITION - 100FT setback from STAMP/Nation's Territory Property Line



VISUALIZATION 3
SIMULATED CONDITION - 200FT setback from STAMP/Nation's Territory Property Line



VISUALIZATION 4
SIMULATED EXISTING CONDITION - No setback from STAMP/Nation's Territory Property Line



VISUALIZATION 4
SIMULATED CONDITION - No setback from STAMP/Nation's Territory Property Line



View of Fire Suppression Tank Blocked by Intervening Vegetation
Distance to Tank - 1.25 Miles

VISUALIZATION 4
SIMULATED CONDITION - No setback from STAMP/Nation's Territory Property Line



VISUALIZATION 4
SIMULATED CONDITION - 100FT setback from STAMP/Nation's Territory Property Line



VISUALIZATION 4
SIMULATED CONDITION - 200FT setback from STAMP/Nation's Territory Property Line

Exhibit B



MEMO

To: Colm Curran, Design Manager STREAM
CC: Town of Alabama Planning Board
Mark Boylan, Town of Alabama Attorney
From: Robert D. Klavoon, PE
Date: February 25, 2026
RE: STREAM U.S. Data Centers – North and South Campus
1st Engineering Review

Wendel has completed our first review of the Plans and Design Report, and Stormwater Pollution Prevention Plans (SWPPP) for the STREAM North Campus and South Campus projects as prepared by Bowman Consulting Engineering dated January 2026. Based upon our review, we offer the following comments.

North Campus

General Site Plan/Details

1. Please provide a legend for all linetypes and symbols on all plan sheets.
2. Please show any easements and the existing ROW along Crosby Road on sheet C-101-N. Note easement widths and label as necessary.
3. Please provide additional dimensions for roadway and edge of pavement locations on sheet C-121-N.
4. Please provide radii at the entrance road from Crosby Road on sheet C-121-N.
5. Please provide width dimensions and stationing along roadways on sheets C-121-N & C-122-N.
6. Please provide the total disturbed area on the erosion and sediment control plan, sheet C-183-N. It is shown in the legend as 000.00 Ac. Erosion and sediment controls are shown with proposed layout. Be sure controls are placed before construction begins.
7. What provisions are made on the site plan for trucks/vehicles for missing the entrance turn to the first driveway and going down to the exit driveway? Will larger trucks have to back out to entrance booth or will the exit gate be able to be remotely raised to allow trucks to the far gate?
8. The design engineer is advised that the Town of Alabama is requesting that the “Stamp Substation Access Road” needs to be constructed to Town of Alabama Highway Standards including the proper depth of sub base, asphalt base, binder that top. The width of the road shall meet Town Highway Standards in order to meet the potential for future dedication as an actual Town road. The design engineer must provide information on the current state of the access road and if necessary perform field work to verify current depth of subbase stone and asphalt.
9. When will the details on the proposed substation be provided for review?
10. Please provide details on the proposed 4’ MSE retaining wall on Sheet C-121-N. A profile of the view of this retaining wall must be shown on the detail sheets.



11. Please show the locations of the proposed generators on the site plan.
12. Please provide a drawing showing the location the proposed site and buildings plotted on the boundary survey showing all adjacent property owners and property lines. A larger scale of 1"=100' would be acceptable.
13. Please provide your signage plan for your project as part of this submission. This will include all signs on the side of your building as well as any proposed ground mount signs. Dimensions, colors, and logos must be included.

Engineering Report

1. The only water system calculations in the engineering report are water demand. Other information that needs to be shown includes: static waterline pressure at the waterline at the right-of-way, anticipated pressure at the facility with headloss calculations through the water service and backflow preventer/RPZ and meter, fire flow calculations for the facility, and comment on the need to provide a sprinkler system. A description of the fire protection system and domestic water system need to be described in greater detail within the engineering report so that clear design parameters are discussed for each type of service. Sprinkler demands must also be discussed as part of the fire protection system.
2. Has the fireflow test been completed at project site to determine adequate fire protection? This information is critical for determination of pressures within the system.
3. Backflow prevention type, placement, and supporting calculations shall be submitted for review. The applicant is required to provide to our office a separate backflow prevention application (x4 copies) for the necessary hot boxes including plans, specifications, RPZ information, water meter information, signed DOH forms, review fee, and engineering report. We will facilitate the signature of the DOH forms by the Town and submit them to the Genesee County Health Department for approval. The backflow prevention application does not need to be completed prior to Planning Board approval.
4. The report needs to include the sewermain sizing and pump station sizing calculations. None are currently shown other than sewer demand.
5. The report should also include a project location map.

Utilities – General

1. All proposed water and sewer mains shall have stationing, not just a LF called out on the plans. They should match the stationing that is on the profiles. Any valves, fittings, and hydrants should also have stationing and offsets called out.
2. All waterlines must have lengths, fittings, and diameters called out on the design plans. Accuracy to the nearest foot is acceptable.

Utilities – Water/Sewer

1. The proposed watermain services coming off the main at Crosby Road are not labeled correctly. This small area has a lot going on, so it may be beneficial to have an enlarged plan of the service connections and hot boxes.
2. The plans show a 3" tap for a 4" water service, why is this not a 4" tap? Plans show 12"x12"x10" tee, so why does callout state the service tap is on 12" main? Callouts also state there are gate valves (by others) but not shown on plans. Please revise to clarify what is going on in this area.



3. The tap for the southern hot box is shown as a 12"x12"x10" tee. We believe this should be a 12"x12"x3" tee for the domestic water connection. The design engineer should review and revise the plans accordingly.
4. In general, the design and connections of the connection to the existing watermain and hotbox needs to be revisited. All the connections are extremely confusing. Why does a 3" tap need to be done on a 10" line for the larger hot box? Wouldn't a 10"x10"x4" DIP fitting be used instead?
5. Please show the type of material of the existing watermain and sewer line on the utility site plans.
6. There are many areas where the 6" PVC sanitary is at a slope of 0.25%. The minimum pipe slope for 6" is 1% and should be closer to 2% for optimal scouring velocity. Please revise slopes accordingly.
7. CN-08B is labeled as existing ("EX" in callout). Please revise to clarify that it is proposed, not existing.
8. Please label the rim elevations of all sanitary manholes on the plan view. This includes all new manholes for this project as well as the structures located within the Crosby Road right of way.
9. Manholes shall not have the same Inverts in and out. Please show a change in elevation in order to continue flow through the manholes.
10. The sanitary sewer mains from BC-2 and BC-4 both have a slope greater than 4% to the next manhole. The slope should be designed to maintain a velocity of 2 feet per second to prevent solids from settling, but not exceed 10 feet per second. Please revise as necessary.
11. MH-10 has a foot difference between invert in and invert out. Please confirm this was intended.
12. Both BC-3 and BC-4 INV out is 00.00. Please revise.
13. Confirm that the sanitary sewer on the north and south sides of the buildings on Sheet C-161-N is 10' from the water main.
14. Water line crossings on the sanitary sewer profile show that some water lines do not have 5' of cover. Please revise so that all water lines have 5' of cover.
15. MH-8 and MH-1 (and any other manhole with a difference in inverts over 2.0') should be labeled as drop connections.
16. Connection to existing sanitary sewer needs to be called out on plans, whether it's being core drilled, and included in the detail pages to see if core drill falls on a manhole section seam.
17. The design engineer needs to check the slopes and inverts on all sanitary sewer mains. Ex. The slope or invert between BC-2 and MH-8 appears to be incorrect (off by 0.17'). Wendel did not do a comprehensive review of all slopes of all manholes.
18. Please add a sanitary sewer inside drop connection detail to the detail sheets.
19. Plans should note which manholes are flat top manholes (where rim to invert dimension is less than 7.1').
20. Existing manholes CN-06 and CN-07 that are on the profile are not shown on the plan sheet. Please revise plan sheet to include at least the callout for CN-07.
21. Please indicate the invert direction on the plan sheets for all sanitary sewer manholes.
22. Typical waterline trench detail Note 2 is missing some words at the end. Also, the detail should note 5-foot minimum depth of cover, not "variable".



23. "Standard Connection to Watermain Domestic Water Service to O&M Building" detail references an O&M building. Revise if this does not apply to this project. This detail also references type k copper water service line. Please revise to match the plan sheets which reference Polyethylene.
24. Grinder pump station shown on detail sheet C-507-N does not have any project specific information on it such as elevations, etc. Please revise the plan sheet to include project specific design information for the lift station that matches the calculations in the engineering report.
25. Why is a second hot box and RPZ shown on Sheet C-161-N for the east building? Can the east building not be split off after the other hot box for the domestic water for the west building? Please explain the redundancy for the domestic water, but the fire protection water is serviced out of a single connection for both buildings.
26. All fittings on the fire protection line must be called out on Sheet C-161-N.
27. What do the hatched areas in orange on the plan sheets indicate for the FP and W lines?
28. Is there water service and restroom facilities at the guard house?
29. Who is responsible for the installation of the new 12" watermain extension within the right of way? Will this be done by the Town of Batavia? Where are the sample points necessary for this installation?
30. Please provide mainline valves on the FP line around the buildings at appropriate intervals. We will leave it up to the design engineer to determine whether these should be post indicator valves.
31. Please completed the missing reference to the Note at the Top of Sheet C-162-N.

Grading/Road Profile

1. Please provide stockpile locations on plans on sheets C-151-N & C-152-N.
2. Please provide spot elevations for adjacent properties on sheets C-151-N & C-152-N.
3. Please provide energy dissipation at 46 HW, 48A HW, 29 HW, 31 HW, and 58 HW on sheets C-151-N & C-152-N.
4. Please show the proposed water and sanitary sewer mains in the profile of the stormsewer.

Drainage

1. Please check to ensure all pipe and structure sizes agree between plan view and profile view.
2. The outlet of 3 OS is called out as 30" on the structure label but is labeled as 18" on the pipe label and in the HydroCAD model. Please revise.
3. Please show alignments and stationing on sheets C-151-N & C-152-N.
4. Please provide stationing and offsets for drainage structures on sheets C-151-N & C-152-N.
5. Pipe cover in areas of 54 CB (6"), 55 CB (5.5"), and 57 CB (10") appear to be extremely shallow with barely any cover. Manufacturer's recommendations typically stated a minimum of 1' of cover shall be provided to the bottom of flexible pavement. Review and revise accordingly.
6. Information from 87MH to 88CB on sheet C-304-N is illegible; please correct.



7. Bioretention details need to be revised to the updated bioretention details from the 2024 Stormwater Management Design Manual. Please refer to Section 6.4.2 of the 2024 Stormwater Design Manual for specific design requirements.
8. The detail provided for the Micropool notes an “impermeable liner (as required)”. The calculations in the SWPPP state the impermeable liner is required. It is recommended that the detail remove “As required” to avoid any confusion on installing the impermeable liner.

SWPPP

1. Please provide CRIS mapping to show whether the project is located in an archaeological buffer area. Please provide a letter of no effect from SHPO.
2. Please provide a FEMA firmette to show that the project parcel is not in a flood zone.
3. Please provide previous geotechnical investigation from Glynn Group Engineering and Architecture, PLLC and the geotechnical investigation from Whitestone Associates once received.
4. Please complete Note #16 on Sheet C-122-N
5. For sites with greater than one acre of disturbance, the Town of Alabama has a requirement to detain the difference between the 10-year pre-developed storm and the 25-year post-developed 24-hour design storm event. It does not appear this calculation was performed. Include this storm event into the HydroCAD model and report to show this requirement is met.
6. Section 6.3.3 Pretreatment of the New York State Stormwater Management Design Manual (NYS SMDM), dated July 31, 2024, details out the requirement for pretreatment specific to bioretention. It appears most of the drainage areas associated with SMP-A, SMP-B, SMP-E, SMP-F, SMP-G, SMP-I, SMP-J, and SMP-K come from the building and paved areas without pre-treatment. Review these areas and the section of the NYS SMDM, and revise accordingly. Only 25% of the WQv for that practice is required to provide pretreatment.
7. Section II.F of the SWPPP states for POA-2, the required water quality volume (WQv) is calculated as 24,161 CF. This is decreased by 23,486 CF by the four bioretentions (SMP-A, SMP-B, SMP-C, and SMP-D), which exceeds the minimum runoff reduction volume (RRv). How is the remaining 675 CF of the required WQv being treated?
8. Section II.F of the SWPPP states for POA-2, the required water quality volume (WQv) is calculated as 66,233 CF. This is decreased by 25,912 CF by the four bioretentions (SMP-E, SMP-F, and SMP-G) as noted in the front end of the SWPPP, which exceeds the minimum RRv. How is the remaining 40,321 CF of the required WQv being treated? There is no discussion regarding SMP-H.
9. The worksheets for POA-3 show a higher RRv met for the bioretentions than what is discussed in the front end of the SWPPP. It also appears that the full WQv is not met. The required WQv is 66,233. The worksheet shows the three bios meet $6,200 + 9,663 + 11,101 = 26,964$ CF through RRv. This leaves 39,269 that would be required for the Micropool. The worksheet shows only 39,137 CF is met. Where is the remaining 132 CF WQv? Revise the written portion of the SWPPP to match the calculations.

10. Section II.F of the SWPPP states for POA-4, the required water quality volume (WQv) is calculated as 28,022 CF. This is decreased by 24,907 CF by the four bioretentions (SMP-I, SMP-J, and SMP-K), which exceeds the minimum runoff reduction volume (RRv). How is the remaining 3,115 CF of the required WQv being treated
11. The worksheets for POA-4 show the same required WQv of 28,022 CF. The calculations show the three bios cover $8,939 + 11,968 + 5,545 = 26,452$ CF of RRv. How is the remaining 1,570 of the required WQv from the calculations treated? Revise the written portion of the SWPPP to match the calculations.
12. HydroCAD:
 - a. Based on the drainage area maps, it appears the Tc for X-DA-2C is limited to the drainage area, whereas the point of analysis is downstream of area X-DA-2. The existing model shows all of these areas point discharging directly to the point of analysis (POA-2). Splitting this area, and the other “OFF-SITE” areas is not representing the true existing drainage area. Review the existing model and revise as needed to ensure Tc and flow aligns with the existing conditions. It appears X-DA-2 and the three off site portions that flow to POA-2 can be combined with one Tc under the existing condition.
 - b. Review the comment above for the subcatchments associated with POA-4.
 - c. Review the Tc for X-DA-1A. It appears the area of redevelopment is ignored, but the Tc appears short for this area.
 - d. Review the drainage areas of the proposed conditions for the buildings. It appears that P-DA-3G would take on a portion of the roof, but it currently does not include any of the roof. Instead, the majority bypasses the bioretention SMP-G and flows directly into the forebays and SMP-H.
 - e. SMP-H Micropool Extended Detention does not appear to have a starting water elevation of 659.40. As currently modeled, each storm will start with the forebays and Micropool empty. Please review and revise.
 - f. SMP-H does not appear to model the emergency spillway. The 100-year storm event shows the peak elevation of 663.08', which is slightly above this elevation.
 - g. SMP-A (41P) appears to have an invert elevation that differs from the plans and the downstream slope differs as well. Please review and revise the model or plans to match.
 - h. SMP-B (43P) appears to have an invert elevation that differs from the plans and the downstream slope differs as well. Please review and revise the model or plans to match.
 - i. SMP-K (45P) appears to have a downstream slope different than the plans. Additionally, the model shows a 7" orifice with a 1' weir above it, while the plans show a 2' weir. Please review and revise the model or plans to match.
 - j. SMP-C (46P) appears to have an invert elevation that differs from the plans and the downstream slope differs as well. Please review and revise the model or plans to match.
 - k. It appears most bioretentions have minimal freeboard to the emergency spillway for the 100-year storm event. Some freeboard shows less than one-inch. Confirm this is the intent of the spillway elevations.
13. Upon spot checks, multiple pipes were found to be under sized. Please review the calculations and provide sizes/slopes that will have capacity for the actual flows. The pipes in the sizing calcs that were initially found:

- a. Pipe 9-CB to 8-MH: Capacity of 4.69 cfs, actual flow of 7.33 cfs.
- b. Pipe 57-CB to 56-MH: Capacity of 2.91 cfs, actual flow of 4.09 cfs.
- c. Pipe 55-CB to 54-CB: Capacity of 10.10 cfs, actual flow of 14.09 cfs.
- d. No other storm sewer calculations were reviewed beyond these locations. The design engineer must review all stormsewers for proper capacity.

Lighting & Electrical

1. Please complete the photometric analysis to demonstrate 0.0 ft-candles of lighting at the property line on all 4 sides of the project site. The current analysis stops at the edge of the site disturbance, but the code requires us to look at the propertyline.
2. Does the photometric analysis include the proposed wall packs on the side of the building?
3. A review of the fixtures on Sheet C-503N does not show them to be dark sky compliant or full cut off fixtures as required by the Town of Alabama.
4. Please show the electrical services for the sewer pump station, guard booth and any lighted signs on the design plans.
5. Note 15 on Sheet C-122-N indicates that the lighting locations will be shown on the architectural drawings. These locations need to be shown on the photometric plan. We believe the parking lot lights are there, but the wall pack lights are not shown.

South Campus

General Site Plan/Details

1. Please provide a legend for all linetypes on all plan sheets.
2. Please provide information on the utilities being removed. Sheet DP-1 only gives utility demo locations. Are these stormsewers and catch basins being removed?
3. Existing drainage to remain should include size and material on sheet DP-1.
4. Please label and use different line weights for existing and proposed ROW lines on sheet SP-1.
5. Erosion and sediment controls are shown with proposed layout on sheet EC-1. Be sure controls are placed before construction begins.
6. Please show flow direction for construction ditch in the laydown yard on sheet LD-1.
7. Please show the locations of the proposed generators on the site plan.
8. Please provide a drawing showing the location the proposed site and buildings plotted on the boundary survey showing all adjacent property owners and property lines. A larger scale of 1"=100' would be acceptable.
9. Please provide your signage plan for your project as part of this submission. This will include all signs on the side of your building as well as any proposed ground mount signs. Dimensions, colors, and logos must be included.
10. Please provide details on the proposed 4' MSE retaining wall on Sheet SP-1. A profile of the view of this retaining wall must be shown on the detail sheets.



11. Sheet DP-1 shows the existing perimeter fence to remain. However Sheet SP-1 show a new 8' high security fence. Will the existing perimeter fence be removed upon completion of the project? Please clarify the intent on the design plans.
12. On Sheet SP-1, what is the rectangular box next to the words "Pavement Marking Arrows" on the south side of the exit road?
13. Please provide the auto-turn scenarios in the plan set.
14. Please provide the Alta survey in the plan set.

Engineering Report

1. The only water system calculations in the engineering report are water demand. Other information that needs to be shown includes: static waterline pressure at the waterline at the right-of-way, anticipated pressure at the facility with headloss calculations through the water service and backflow preventer/RPZ and meter, fire flow calculations for the facility, and comment on the need to provide a sprinkler system. A description of the fire protection system and domestic water system need to be described in greater detail within the engineering report so that clear design parameters are discussed for each type of service. Sprinkler demands must also be discussed as part of the fire protection system.
2. Has the fireflow test been completed at project site to determine adequate fire protection? This information is critical for determination of pressures within the system.
3. Backflow prevention type, placement, and supporting calculations shall be submitted for review. The applicant is required to provide to our office a separate backflow prevention application (x4 copies) for the necessary hot boxes including plans, specifications, RPZ information, water meter information, signed DOH forms, review fee, and engineering report. We will facilitate the signature of the DOH forms by the Town and submit them to the Genesee County Health Department for approval. The backflow prevention application does not need to be completed prior to Planning Board approval.
4. The report needs to include the sewermain sizing and pump station sizing calculations. None are currently shown other than sewer demand.
5. The report should also include a project location map.

Utilities – General

1. All proposed water and sewer mains shall have stationing, not just a LF called out on the plans. They should match the stationing that is on the profiles. Any valves, fittings, and hydrants should also have stationing and offsets called out.
2. All waterlines must have lengths, fittings, and diameters called out on the design plans. Accuracy to the nearest foot is acceptable.

Utilities – Water/Sewer

1. In general, the design and connections of the connection to the existing watermain and hotbox needs to be revisited. All the connections are extremely confusing. Why does a 3" tap need to be done on a 10" line for the hot box? Wouldn't a 10"x10"x3" DIP fitting be used instead?
2. What do the hatched areas in orange on the plan sheets indicate for the FP and W lines?
3. Please show the type of material of the existing watermain and sewer line on the utility site plans.



4. Please label the rim elevations of all sanitary manholes on the plan view. This includes all new manholes for this project as well as the structures located within the Crosby Road right of way.
5. Manholes shall not have the same Inverts in and out. Please show a change in elevation in order to continue flow through the manholes.
6. The sanitary sewer main from BC (main building) has a slope greater than 5% to the next manhole. The slope should be designed to maintain a velocity of 2 feet per second to prevent solids from settling, but not exceed 10 feet per second. Please revise as necessary.
7. There are 2 buildings with a label "BC". These should be numbered to differentiate.
8. Any manhole with a difference in inverts over 2.0' should be labeled as drop connections.
9. Please add a sanitary sewer inside drop connection detail to the detail sheets.
10. Connection to existing sanitary sewer needs to be called out on plans, whether it's being core drilled, and included in the detail pages to see if core drill falls on a manhole section seam.
11. Plans should note which manholes are flat top manholes (where rim to invert dimension is less than 7.1').
12. Please indicate the invert direction on the plan sheets for all sanitary sewer manholes.
13. The sanitary sewer holding tank on plans is shown as 14,000 gallons and the report states it is "16,000 (no units)". Please clarify what the correct volume of the tank is.
14. Is there water service and restroom facilities at the guard house?
15. Typical waterline trench detail Note 2 on sheet DT-6 is missing some words at the end. Also, the detail should note 5-foot minimum depth of cover, not "variable".
16. "Standard Connection to Watermain Domestic Water Service to O&M Building" detail references an O&M building. Revise if this does not apply to this project. This detail also references type k copper water service line. Please revise to match the plan sheets which reference Polyethylene. **plan.**
17. All fittings on the fire protection line must be called out on Sheet SW-1.
18. Please provide mainline valves on the FP line around the buildings at appropriate intervals. We will leave it up to the design engineer to determine whether these should be post indicator valves.

Grading/Road Profile

1. Please provide spot elevations for adjacent properties on sheet GD-1.
2. Please show the proposed water and sanitary sewer mains in the profile of the stormsewer.

Drainage

1. Please check to ensure all pipe and structure sizes agree between plan view and profile view.
2. Please provide stationing and offsets for all drainage structures on sheet GD-1.
3. Bioretention details need to be revised to the updated bioretention details from the 2024 Stormwater Management Design Manual. Please refer to Section 6.4.2 of the 2024 Stormwater Design Manual for specific design requirements.

SWPPP

1. Please provide CRIS mapping to show whether the project is located in an archaeological buffer area. Please provide a letter of no effect from SHPO.
2. Please provide a FEMA firmette to show that the project parcel is not in a flood zone.
3. Please provide previous geotechnical investigation from Glynn Group Engineering and Architecture, PLLC and the additional geotechnical investigation once received.
4. For sites with greater than one acre of disturbance, the Town of Alabama has a requirement to detain the difference between the 10-year pre-developed storm and the 25-year post-developed 24-hour design storm event. It does not appear this calculation was performed. We understand this site was partially constructed for the approved plans related to the Plug Power Hydrogen Production Facility. For the calculation related to this detention requirement, the existing condition should be the site prior to the improvements associated with that original project. This would include the now existing bioretention, pre-treatment basin, and dry pond. This revision to the existing condition should only be done for this requirement, not the detention requirements calculated as part of the general permit.
5. HydroCAD Comments:
 - a. The point of analysis is located upstream of the existing bioretention, pre-treatment basin, and dry pond. However, the drainage area maps show some of the site that will be disturbed sheet flows to these practices, such as the bioretention. It would appear the location of the point of analysis should be moved downstream. Please note, there is a structure upstream of the pre-treatment basin and the dry pond where flow can split between dry-weather and wet-weather events.
 - b. The existing HydroCAD model does not link any of the subcatchments. Based on the plans, it would appear that the “PIPED FLOWS TO SMPs” should be connected to the “Pre-treatment basin” and then on to the “Bioretention Basin”. These would typically be modeled as ponds to account for the storage. Please review the existing conditions and revise the model accordingly.
 - c. It appears some areas on the existing drainage maps differ from the areas recorded for each subcatchment in the HydroCAD model.
 - d. The existing subcatchment 8S calls for over 21 acres of area but shows a Tc with a total length of 210 LF. Please review and ensure the Tc is accurate. Please review all subcatchments to verify the Tc and paths are accurate.
 - e. The post-development conditions show the bioretention, pre-treatment basin, and dry pond all direct discharge to the analysis point. It would appear these systems are connected. Refer to the previous note and revise accordingly.
 - f. Refer to the comment above regarding the Tc and lengths to be reviewed for the proposed HydroCAD model as well. P-DA-1A is close to two acres but the Tc path is 64 LF.
6. The slope of the dry swale in the GI worksheet is recorded as 1% but the plans show 0.6%. Is the worksheet rounding this slope?



Lighting & Electrical

1. Please complete the photometric analysis to demonstrate 0.0 ft-candles of lighting at the property line on all 4 sides of the project site. The current analysis stops at the edge of the site disturbance, but the code requires us to look at the propertyline.
2. Does the photometric analysis include the proposed wall packs on the side of the building?
3. A review of the fixtures on Sheet DT-3 does not show them to be dark sky compliant or full cut off fixtures as required by the Town of Alabama.
4. Please show the electrical services for the guard booth and any lighted signs on the design plans.
5. Note 15 on Sheet SP-1 indicates that the lighting locations will be shown on the architectural drawings. These locations need to be shown on the photometric plan. We believe the parking lot lights are there, but the wall pack lights are not shown.

General Comments/Requests

1. Please provide a copy of the completed Agricultural Data Statement. The Town of Alabama cannot refer the project to the Genesee County Planning Board without this document.
2. Wendel will forward comments from the Town of Alabama Fire Department and Genesee County Emergency Services once received.
3. Comments on the landscaping plans for both sites will be forthcoming from Wendel when they are ready.
4. Please provide a written justification for the reduction of the parking spaces on the site plan.
5. Please provide written responses to the Town of Alabama Planning Board comments based upon the email provided dated January 13, 2026.
6. Please explain the thoughts behind the parking spaces located adjacent to the guard house, including the need to have an ADA accessible parking site at this location. Is it the intent for visitors to park in these parking spaces and then be escorted into the facility? If that is the case, there are no sidewalks between this designated parking area and the building, as well as an access point past the security fence for pedestrian traffic. Please provide a breakdown of the number of parking spaces needed for full buildout of the employees, taking into account the different shifts worked as well as the allocation of visitor parking and how that interacts with access to the building from beyond the secure fenceline.

A letter outlining the proposed changes along with 2 sets of revised plans must accompany the next submission for review.

If you have any questions, please do not hesitate to contact our office.



To: Colm Curran, Design Manager STREAM
CC: Town of Alabama Planning Board
Mark Boylan, Town of Alabama Attorney
From: Nina Ballou, Andrew Reilly
Date: February 25, 2026
RE: STREAM U.S. Data Centers – North and South Campus
1st Planning Review

Introduction:

This memorandum provides a preliminary comprehensive planning, zoning, and environmental review of the proposed STREAM Data Center at the STAMP site. It evaluates the project for conformance with the TD-1 Zoning code and Design Standards and Guidelines, the STAMP GEIS and Findings, and the applicable Incentive Zoning Conditions (#24, #25, and #36). The goal is to assist the Planning Board in determining whether the proposed Stream North and South Campus developments meet all required siting, design, environmental, and operational standards established for development within the STAMP Technology District.

TD Design Guidelines

The Technology District (TD-1) Design Guidelines were established through the Town of Alabama’s Incentive Zoning Agreement with GCEDC as part of the STAMP development framework. They set the required standards for site layout, architecture, circulation, screening, and visual mitigation for all development within the Technology District. These guidelines are relevant to the STREAM Data Center review because they define the mandatory design and performance criteria that each project at STAMP must meet to ensure consistency with the Town’s zoning, the STAMP GEIS, and the community’s long-term development expectations.

Requirements That Appear to Be Met or Demonstrated (see the checklist):

Site Planning – Building Siting and Orientation

The plans show clearly identifiable primary building entrances and organized internal circulation. Buildings are arranged within a campus-style layout with defined access drives and internal road hierarchy, consistent with the objective of providing orientation and organized vehicular access.

Utilities and Mechanical Equipment (Visual Mitigation)

The plans identify generator yards and secured equipment areas separated from general circulation and placed internal to the site. The site layout demonstrates intent to locate operational equipment away from public road frontage, consistent with the requirement to minimize visual impacts of equipment in public zones.

Service, Delivery, and Storage Areas

Loading and service areas are located internal to the site and not directly fronting the primary roadway. Service areas are placed within controlled yards rather than open frontage areas, supporting the requirement that service areas not dominate building frontage or be prominently visible from public roadways.

Screening (Submission Requirement)

The plans include perimeter fencing and defined secured yards, and architectural materials are incorporated into visible building surfaces rather than leaving exposed industrial components facing public areas. The organization of equipment yards within the interior of the site demonstrates an approach consistent with screening intent.

Vehicular Access and Circulation

Entrance drives are clearly defined and separated from parking aisles. Internal circulation loops allow vehicles to maneuver without backing movements into public roadways, consistent with the requirement to prevent vehicles backing from public streets.

Architectural Design – Visible Areas

Architectural elevations show variation in façade materials, vertical articulation, and modulation rather than uninterrupted wall planes. Materials include finished panels and treated surfaces rather than unfinished structural block, addressing the requirement to avoid large blank wall surfaces and to incorporate architectural features on visible walls.

Roof-Mounted Equipment (Submission Requirements)

Roof equipment appears screened within parapet structures, consistent with the requirement that visible roof equipment be screened or unobtrusive when viewed from public roadways.

Landscape Design (Submission Requirement)

Landscape renderings and plans have been provided showing planted buffers and vegetation intended to soften building edges and integrate development with surroundings, satisfying the requirement that a landscape plan be submitted as part of the application. Final review is necessary (see below).

Signage

Monument-style signage is indicated rather than pole signage, consistent with the requirement prohibiting pole signs and limiting scale relative to buildings.

Lighting

The construction notes specify dark-sky compliant lighting and downward-directed fixtures consistent with the lighting standards requiring horizontal installation and mitigation of upward light or glare. Final design still needs review and approval (see below)

Requirements Still Needing Confirmation or Conditions

While the plans demonstrate intent to comply with many TD standards, several items require either detailed sheet verification or conditions of approval to ensure ongoing compliance:

- Final landscape species schedule and buffer density confirmation
- Final photometric values confirming no off-site light trespass
- Detailed screening treatment for mechanical equipment and generator yards
- Final architectural material schedule and color palette approval

- Final architectural visualizations viewing the building from both the northeast and northwest
- Final architectural visualizations of rooftop screen mechanisms
- Confirmation of service/loading enclosure screening details
- Final signage design details and placement verification
- Post-construction maintenance obligations for landscaping and screening

SEQR Findings

The SEQR Findings represent the Town of Alabama’s formal conclusions from the STAMP Environmental Impact Statement process (The Planning Board and Town Board have their own SEQR Findings because each are an Involved Agency). They identify the environmental impacts evaluated for the overall STAMP site, the mitigation measures required to address those impacts, and the conditions that all individual projects must follow. These Findings are relevant to the STREAM Data Center because they establish the environmental, infrastructure, and community-character standards that each development must meet to remain consistent with the assumptions and approvals underlying the STAMP GEIS.

STREAM Data Center – GEIS Conformance Review Summary (See Findings Checklist)

7.1 Geology and Topography

The project proposes grading and fill to establish building pads consistent with previously disturbed STAMP development areas. No bedrock removal is anticipated and no wetlands are present within either campus area. Stormwater discharge locations are maintained and site grading will be subject to SWPPP and engineering review, consistent with the mitigation framework established in the STAMP GEIS. See engineering review analysis.

7.2 Water Resources

The stormwater management system is designed to maintain site hydrology and comply with NYS SPDES permitting requirements. The project does not withdraw groundwater and does not discharge industrial wastewater. The development is located outside Whitney Creek buffers and does not impact regulated wetlands or designated preservation areas. The project therefore aligns with the water resource impact assumptions analyzed in the GEIS. See engineering review analysis.

7.3 Air Resources

Traffic generation is nominal relative to STAMP thresholds and is primarily light-duty vehicle trips. Temporary construction dust is the only anticipated air impact and is consistent with impacts analyzed in the GEIS. No manufacturing emissions or process exhaust are proposed. Exhaust from the emergency generators needs to be analyzed.

7.4 Terrestrial and Aquatic Ecology

The South Campus area is previously disturbed and the North Campus consists of open field with scattered vegetation. No wetlands or sensitive habitats are present within the project footprint. Development occurs within planned buildable areas of the STAMP master plan and does not alter protected conservation lands.

7.5 Technology Industry Health and Safety

The project is a data center use and does not involve manufacturing processes or chemical by-products. Operations therefore fall below the intensity of industrial activities evaluated in the GEIS and are consistent with the established safety mitigation framework. Additional review will be required for the emergency generator’s diesel fuel storage.

7.6 Traffic and Transportation

Trip generation remains well below both Phase 1 and full build-out STAMP traffic thresholds. The project does not trigger additional roadway mitigation measures and does not materially affect planned transportation improvements.

7.7 Land Use and Zoning

The project is consistent with the TD-1 zoning district and overall STAMP development pattern. A waiver is requested for reduced parking counts based on operational demand typical of data center facilities. See zoning analysis.

7.10 Community Character and Visual Resources

The project incorporates setbacks, landscaping buffers, and dark-sky compliant lighting. The buildings are located internal to the site and buffered from roadways. Noise analysis indicates compliance with applicable standards. The proposal aligns with the community character mitigation framework of the GEIS.

7.12 Agricultural Resources

The site is not currently in active agricultural use and development occurs within the planned STAMP development envelope. The project remains consistent with the Town's Agricultural and Farmland Protection Plan and does not create additional agricultural conflicts beyond those evaluated in the GEIS (Agricultural Data Statement and process to be completed).

Items Requiring Confirmation or Additional Documentation

While the project generally conforms to the GEIS findings, the following items should be confirmed prior to final determination to ensure the record demonstrates consistency with analyzed impact thresholds (as illustrated previously):

Utilities and Infrastructure

- Peak electrical demand and substation capacity
- Cooling method and water consumption (if applicable)
- Domestic sanitary flow confirmation and absence of industrial wastewater
- Generator fuel storage quantities and operating duration assumptions

Noise

- Property line sound levels (day/night)
- Generator testing frequency and duration
- Tonal or continuous mechanical noise evaluation

Lighting

- Final photometric plan confirming no off-site light spill

Parking Waiver

- Operational staffing levels supporting reduced parking supply

Emergency Services

- Fire flow demand and fire department coordination

Construction

- Phasing schedule and truck routing

Incentive Zoning

Incentive zoning at STAMP was established through the Town of Alabama’s agreement with GCEDC to allow greater development flexibility in exchange for providing public benefits and implementing specific planning and mitigation measures. Through this framework, the Town created the TD-1 Technology District and adopted additional design, screening, infrastructure, and environmental standards that all site-specific projects must meet. These requirements are relevant to the STREAM Data Center because Conditions #24, #25, and #36 of the STAMP Findings mandate compliance with the TD-1 zoning, the STAMP Land Management Plan, and the incentive-zoning-based design and performance requirements that govern development within the STAMP campus.

Condition #24 - Technology District (TD-1) Zoning Compliance

7.7 Land Use and Zoning

The STREAM North and South Campus buildings are sited well within the interior of the STAMP campus, consistent with the TD-1 district created under the Town-GCEDC Incentive Zoning Agreement. Building massing, circulation hierarchy, and internalized access points follow the TD-1 standards, including large setbacks (184’ front; 263’ side) that far exceed minimum requirements, and full compliance with height, lot frontage, and permitted-use provisions. The project therefore fulfills Condition #24, which requires all site-specific development to comply with the TD-1 zoning framework established through incentive zoning.

Condition #25 - STAMP Land Management Plan (LTMP) and Visual/Environmental Integration

7.10 Community Character and Visual Resources

Both campuses incorporate substantial vegetative buffers, progressive-aging landscaping, and internal building placement that reduces visual exposure from Crosby Road. Renderings provided for both North and South Campuses demonstrate screening effectiveness at installation and maturity. Lighting is dark-sky compliant, minimizing glare and spillover. These measures meet Condition #25 requirements to implement LTMP visual mitigation, landscaping, and community-character protections. The project will be fully analyzed against the Long Term Management Plan.

7.12 Agricultural Resources

The project footprint lies entirely within designated buildable areas of STAMP and does not encroach upon farmland protection areas or active agricultural land. This satisfies Condition #25, which carries forward STAMP’s farmland protection strategy and requires non-interference with protected agricultural zones.

Condition #36 – Site-Specific Compliance with Incentive-Zoning Design, Screening, Circulation, Architecture, and Infrastructure Standards

7.1 Geology and Topography

Grading and fill are consistent with previously disturbed STAMP areas and are subject to SWPPP compliance and engineered stormwater controls. No bedrock removal or wetland impact is anticipated. These design practices align with Condition #36, which requires adherence to all site-specific environmental and engineering standards derived from incentive-zoning implementation. See engineering review.

7.2 Water Resources

The stormwater system includes twelve (12) post-construction SMPs, bioretention, micropool detention, and compliance with NYS SPDES standards. No groundwater withdrawal or industrial wastewater discharge is proposed. The layout avoids all regulated wetlands and Whitney Creek buffers. This satisfies Condition #36 requirements for project-level stormwater, utility, and water resource compliance. See engineering review.

7.3 Air Resources

No industrial emissions or process air pollutants are generated by the data center use. Construction dust is the only anticipated air impact and is consistent with GEIS expectations. This conforms to Condition #36, requiring consistency with GEIS-established operational impact assumptions.

7.4 Terrestrial and Aquatic Ecology

The North Campus is composed of open field with scattered vegetation; South Campus is previously disturbed. No sensitive ecological features or wetlands occur within the project area. Development remains within designated buildable envelopes. This fulfills Condition #36, requiring site-specific adherence to ecological mitigation assumptions.

7.5 Technology Industry Health and Safety

The STREAM facility does not involve industrial manufacturing or chemical processes. The proposed data center operations fall below the intensity assumed in GEIS hazard modeling and align with Condition #36, which requires consistency with STAMP's safety mitigation framework.

7.6 Traffic and Transportation

Trip generation remains substantially below Phase 1 and full build-out STAMP thresholds. Site circulation is fully internalized, supported by WB-67 AutoTurn verification, and avoids backing movements into public ROW. This conforms with Condition #36, which requires adherence to STAMP traffic model thresholds and safe internal circulation design.

7.10 Community Character (Architecture, Screening, Lighting)

Architectural elevations show high-quality façade materials, articulated massing, parapet screening, and integrated color palettes. Mechanical yards, substations, and equipment pads are internalized and screened by fencing and building placement. Lighting is dark-sky compliant and downward-directed. This fully satisfies Condition #36, requiring screening of equipment, architectural design standards, and lighting controls.

Items Requiring Confirmation or Additional Documentation

While the project conforms with all applicable **Incentive Zoning Conditions #24, #25, and #36**, the following items must be finalized to document full alignment with GEIS-analyzed thresholds:

Utilities and Infrastructure

- Final electrical demand specification and substation capacity confirmation
- Cooling method and any water consumption verification
- Domestic sanitary flow confirmation
- Generator fuel storage volume and runtime assumptions

Noise

- Final day/night property-line sound levels

Generator test cycle frequency and duration
Mechanical equipment tonal/noise character assessment

Lighting

Final photometric plan demonstrating no off-site light trespass

Parking Waiver

Documentation of staffing levels supporting reduced parking

Emergency Services

Fire flow analysis and Fire Department coordination memo

Construction

Project phasing schedule
Construction truck routing plan

Conclusion

The STREAM Data Center project substantially conforms to the TD-1 Design Guidelines, the STAMP GEIS, and Incentive Zoning Conditions #24, #25, and #36. Site layout, circulation, architecture, screening, environmental protection, and operational characteristics all align with STAMP's adopted development framework. Technical documentation items remain, such as final photometrics, landscaping details, noise data, and emergency-services coordination, and these can be addressed through conditions of approval. With these items completed, the project could fully satisfy all planning, zoning, and environmental requirements for development at the Alabama STAMP site.