

February 26, 2025

Genesee County Economic Development Center

99 MedTech Drive
Batavia, New York 14020

Mark Masse
President and CEO

Re: Project Double Reed | February SEQR Follow Up Letter

Dear Mark,

This letter contains our point-by-point response to the February SEQR Follow Up Letter for Project Double Reed, as forwarded to Stream Data Centers on February 10, 2025.

GCEDC Question 1: Fuel Storage and Usage:

- a) *Please clarify the amount of diesel fuel which will be used based on the number of estimated hours of operation of the backup generators; and frequency of fuel delivery per year.*
- b) *Provide details on the total volume of all diesel storage tanks utilize for the generators proposed for the project.*

SDC Response: The project's planned generator units will each consume approximately 7,200 gallons of fuel annually, resulting in a total estimated fuel consumption of 43,000 gallons. This estimate is based on manufacturer specifications, which provide expected fuel consumption in gallons per hour, and assumes runtime for regular testing, maintenance, and a single 24-hour emergency operation period. This emergency operation is expected to be infrequent due to the project's connection to high-voltage transmission infrastructure. The total volume of all diesel storage tanks will be approximately 60,000 gallons, allowing for variation in the final fuel tank capacities for each generator. Each generator set has a 9,500-gallon fuel tank, meaning the estimated annual fuel consumption suggests a single fuel delivery per year.

GCEDC Question 2: Noise

- a) *The Noise Modeling Results ("Noise Report") in the SEQRA Reports, provides modeled acoustic impacts, stating that two potential mitigation measures will be required to reduce noise impacts to 45 dBA. The Noise Study provides modeled impacts inclusive of these mitigation measures under the "Constant Mechanical" scenario. Please update to also include modeled mitigated acoustic impacts during the "Generator Maintenance" and "Emergency Generator" scenarios.*

SDC Response: The Noise Modeling Report has been revised to include the mitigated acoustic impact results for the Generator Maintenance and Emergency Generator scenarios. Furthermore, the project will strive to meet the New York State Department of Environmental Conservation (NYS DEC) noise emission standards. This will be achieved through the mitigation options outlined in the report, or through alternative approaches as mutually agreeable to the relevant authorities having jurisdiction.

GCEDC Question 3: Stormwater

- a) *The Nation has expressed concern with respect to stormwater flows resulting from the Project. Please provide any additional details available on the stormwater management for Project Double Reed with regard to: (i) expected volume and quality of stormwater discharge from the*

site; (ii) stormwater quality controls proposed to prevent impacts to surface and groundwaters adjacent to the site, and; (iii) the degree of flood resilience of any designed stormwater management.

SDC Response:

- (i) **Expected Volume and Quality of Stormwater Discharge:** The project's stormwater management system will be designed to meet all applicable New York State Department of Environmental Conservation (NYS DEC) permitting requirements and the standards outlined in the Stormwater Management Design Manual. The State Pollutant Discharge Elimination System (SPDES) permit and Design Manual emphasize stormwater quality control with calculations of expected stormwater discharge volume and pollutant load reductions including estimates of pollutant loads (e.g., total suspended solids, phosphorus, and nitrogen) before and after the implementation of stormwater controls. These calculations and modeling employ approved hydrologic methods and account for design storms of various known localized return frequencies as well as other relevant storm events as required.
- (ii) **Stormwater Quality Controls:** The project will implement a "treatment train" approach using a combination of source controls and structural stormwater control practices (SCPs) as detailed in the NYS DEC Design Manual. The selected SCPs will be designed to meet or exceed NYS DEC water quality standards and will be justified based on site-specific conditions and pollutant removal requirements. All applicable NYS DEC permitting requirements will be met.
- (iii) **Flood Resilience of Stormwater Management:** The project's stormwater management system will be designed with flood resilience as a priority, exceeding requirements where necessary. This will include designing for larger storm events, properly sizing conveyance systems, and incorporating features like emergency spillways. The design will adhere to all applicable NYS DEC flood management guidelines and will consider future conditions as appropriate.

GCEDC Question 4: Visual Impacts

- a) *The Nation has expressed concerns regarding lighting for the Project, which we understand to be dark-sky compliant lighting fixtures in accordance with the STAMP GEIS and Town of Alabama zoning code. Please provide a photometric plan for Project Double Reed to demonstrate the degree of light spillage (if any) resulting from the Project onto neighboring parcels.*
- b) *Provide updated Conceptual Architecturals to include proposed mitigation screens discussed in the Noise Report provided with the SEQR Reports.*
- c) *Provide an update to the Visual Assessment included in the SEQR Reports reflecting the proposed mitigation screens discussed in the Noise Report, if they would be visible from the existing viewpoints.*

SDC Response:

- a) A conceptual photometric plan has been developed for the project. This plan integrates dark-sky compliant fixtures and demonstrates the project's potential light emittance, ensuring conformity with the STAMP GEID and the Town of Alabama zoning code.
- b) The conceptual architectural drawings have been updated to illustrate the conceptual mitigation screens outlined in the Noise Modeling Report.

- c) The visual assessment has been updated to illustrate the conceptual mitigation screens outlined in the Noise Modeling Report.

GCEDC Question 5: EAF Inconsistencies

- a) *Please revise the Environmental Assessment Form (“EAF”) submitted with the SEQR Reports to indicate that Project Double Reed involves an impoundment of water for stormwater management.*

SDC Response: The Environmental Assessment Form has been updated indicating that the current conceptual plan incorporates constructed basins designed to temporarily store and control the release of stormwater runoff from the site, which is a common best practice for projects of this size. The final dimensions and design specifications of these basins will be determined through further engineering analysis, ensuring compliance with all applicable New York State Department of Environmental Conservation permits and the Stormwater Management Design Manual standards.