



January 2, 2026

VIA EMAIL

Tonawanda Seneca Nation
PO Box 795
7027 Meadville Road
Basom, NY 14013
c/o Chief Scott Logan

Re: STAMP SEQRA Review - Project Double Reed

Dear Chief Logan:

On behalf of the Genesee County Economic Development Center (“GCEDC”), I would like to extend my heartfelt wishes that the men, women and children of the Tonawanda Seneca Nation (“Nation”) are enjoying good health and prosperity.

I have received a copy of your December 18, 2025, email (“Email”) providing comments on GCEDC’s determination to act as lead agency for review of the proposed data center project (“**Project Double Reed**”) located on the Western New York Science & Technology Advanced Manufacturing Park (“**STAMP**”) site pursuant to the State Environmental Quality Review Act (“**SEQRA**”). Specifically, your Email raises a concern that GCEDC’s status as lead agency will prevent a fulsome SEQRA review of Project Double Reed, and that the GCEDC Board members are acting out of motivation for personal economic gain. I am writing to explain that GCEDC’s status as lead agency will in no way limit the depth of SEQRA review for Project Double Reed, and that development of Project Double Reed does not directly or indirectly personally benefit any Board member of the GCEDC. Further, I would like to once again reiterate my offer to meet with you and the Nation to discuss any concerns you may have regarding Project Double Reed so that GCEDC can address such concerns during its review of Project Double Reed.

STAMP SEQRA Process

By way of background, the GCEDC, as an industrial development agency created under New York State General Municipal Law (“**GML**”) § 895-e, must comply with SEQRA prior to undertaking certain actions, such as approving the sale of land for Project Double Reed. Under the regulations for SEQRA, an agency which receives an application to undertake an action must initiate SEQRA as early as possible, and is empowered to act as lead agency for the coordinated review of the action. 6 NYCRR 617.6. As explained by the New York State Department of Environmental Conservation (“**NYSDEC**”) guidance, “[t]he lead agency is

normally the involved agency principally responsible for carrying out, funding or approving an action.”¹

GCEDC has been the lead agency for the SEQRA review of all projects located at the STAMP site, beginning with the initial positive declaration that the development of STAMP could have significant adverse environmental impacts through the preparation and completion of the GEIS in 2012. The purposes of the GEIS were to identify and evaluate the potential significant adverse environmental impacts of STAMP, compare the reasonable alternatives, and, where applicable, to identify mitigation measures to reduce the effect of those impacts to the maximum extent practicable, while weighing the substantial potential social and economic benefits of STAMP. The GEIS comprehensively analyzed the impacts from full build out of STAMP consisting of rezoning the entire STAMP site from agricultural/residential use to industrial/advanced manufacturing use, and with constructing and operating 6,130,000 square feet of advanced technology manufacturing uses at full build-out, providing direct employment for over 9,000 people and--certified that, consistent with social, economic and other essential considerations from among reasonable alternatives evaluated, STAMP avoided or minimized adverse environmental impacts to the maximum extent practicable. The Nation was kept informed and invited to participate in the GEIS process over the two years that the DEIS was prepared but largely chose not to participate or contribute comments.

GCEDC, through great effort and expense, has built a network of staff and consultants capable of thoroughly analyzing impacts at the STAMP site, building over time a deep working knowledge of the STAMP site, and the requirements of the GEIS. GCEDC is also the only agency capable of imposing any and all mitigative requirements to comprehensively minimize any impacts from STAMP development. For example, GCEDC worked with the Nation to establish the buffers along the western edge of the STAMP site to ensure that development at STAMP would not adversely impact the Nation or its territory. GCEDC also abandoned initial plans to construct an on-site wastewater treatment plant over Nation concerns that treated effluent would travel to the Nation’s Territory.

In addition, GCEDC does not conduct its SEQRA review in a vacuum. Other agencies (including NYSDEC) regularly provide comments during the SEQRA process that are factored into GCEDC’s overall review. Comments from the Nation and members of the general public are also considered when they are received.

Furthermore, development at STAMP must satisfy the impact thresholds enumerated in the GEIS and accompanying findings statement. These thresholds provide specific limits on developments and impacts which may not be exceeded without additional supplemental SEQRA review. These thresholds include limits to: (a) maximum buildable site area, (b) maximum building square footage, (c) maximum wetland impacts, (d) permitted uses, (e) minimum lot size, (f) minimum lot frontage, (g) maximum height, (h) maximum lot coverage, (i) parking, (j) traffic, (k) water and sewer demand, (l) energy demand, (m) maximum noise impacts, (n) and air emissions. Accordingly, GCEDC, as lead agency ensures that any project locating at STAMP fully satisfies the requirements of the GEIS.

¹ THE SEQR HANDBOOK, NY State Dep’t. Envtl. Conservation (4th Ed. 2020), at 59.

STAMP Benefits

STAMP is intended to serve as an economic development engine central to the economic sustainability and well-being of the western region of New York State. STAMP will provide economic development opportunities not currently offered in the region, and will offer a variety of jobs for the residents of the Nation, the Town of Alabama, Genesee County, and the Greater Buffalo-Niagara and Rochester regions. In addition, development of STAMP in accordance with the GEIS has the potential to provide significant environmental benefits including the enhancement and preservation (in perpetuity) of approximately 97 acres of wetlands and approximately 24,000 linear feet of streams and upland buffers areas; offsite mitigation of wetlands, streams and buffer habitats located in the Whitney Creek watershed; and the preservation of over 640 acres of common open areas for use as potential recreational areas.

Specific benefits identified in the GEIS from the development of STAMP include:

- Create good-paying, 21st century jobs in the local community.
- Reduce the "brain-drain" of young people leaving the community.
- Provide increased revenues to support local community services.
- Provide enhanced utility infrastructure, such as water, sewer, natural gas, and broadband.
- Reduce local property taxes.
- Demonstrate sustainable development.
- Create a "place" of pride in the community.

With respect to your statement that individual GCEDC Board members are personally benefitting from Project Double Reed, I can assure you that all members of the GCEDC Board are volunteers and receive no compensation for their work or the development of any projects by GCEDC. Further, the GCEDC Code of Ethics Policy adopts Article 18 of the GML, which prohibits officers or employees of the GCEDC from having a personal interest in the financial dealings of the GCEDC.

While we recognize that the development of STAMP and Project Double Reed is not currently desired by the Nation, we believe that these projects have the strong capability of creating substantial and lasting benefits for the Nation and its people. GCEDC remains very interested in working with the Nation to partner on economic development opportunities, and would be interested in meeting with the Nation to discuss such opportunities.

Further, GCEDC remains committed to receiving the Nation's feedback on projects at the earliest opportunity so that concerns raised by the Nation can be addressed. Accordingly, GCEDC requests a meeting at the Nation's earliest convenience to discuss Project Double Reed, including the Nation's views on how the project might impact the Nation's Territory as a Traditional Cultural Property. Please provide us with your availability for a meeting.

Very truly yours,

Genesee County Economic Development Center

By:



Mark A. Masse, CPA
President and CEO

cc: Adam Walters, Esq.
Matthew Fitzgerald, Esq.
Corey Auerbach, Esq.
Stephen Daly, Esq.