

UPDATE: At the public hearings on February 3, GCEDC CEO Mark Masse caved to overwhelming public pressure. The public comment period on the proposed data center financial incentives has been re-opened.

New deadline:

Thursday, February 6 at 5pm

Send comments to: gcedc@gcedc.com, mmasse@gcedc.com, mustang56pz@gmail.com, zarley21@gmail.com, paul.battaglia@battagliacpa.com, czkemp@aol.com, craig@cyfarms.com, kathleenmanne@gmail.com, Marianne.Clattenburg@co.genesee.ny.us

Already submitted one comment, or three? Great! Submit another. Make sure to include our core demand: "I am writing to demand that GCEDC hold a new set of public hearings on the proposed data center financial incentives. The hearing must be scheduled in consultation with the Tonawanda Seneca Nation Council of Chiefs, at least a month in advance, and on a weekday evening."

[Customize your emails with our talking points.](#)

[Or use this one-click email tool to send your message.](#)

[Then, use this one-click tool to call GCEDC CEO Mark Masse.](#) Tell him, "I am calling to demand that GCEDC hold a new set of public hearings on the proposed data center financial incentives. The hearing must be scheduled in consultation with the Tonawanda Seneca Nation Council of Chiefs, at least a month in advance, and on a weekday evening."

****We recommend calling during business hours.**

GCEDC: (585) 343-4866

CEO Mark Masse is at Extension 17

[Overall guidance on developing a comment](#)

[General Talking Points \(applicable to all three projects\)](#)

[Demands to include in written comments](#)

[Example comment](#) (from the one-click tool)

Project Snapshots and comparison chart

- [Potentia](#)
- [Rampart](#)
- [Double Reed](#)

[Here is a link to all of the financial incentive information](#) (which was posted on January 31 at 12pm - the prior deadline for public comment). Scroll down to each of the project names for direct links.

Overall guidance on developing a comment

- Your comment must include the phrase 'proposed financial incentives' and the name of at least one of the applicants. For example, "I am writing to express comments about the proposed financial incentives being offered by GCEDC to Project Potentia." You do not need to discuss the incentives in substance. However, the legal purpose of the comment period is to get comments on the incentives, so you must reference them.
 - For more info on the proposed incentives, [see this piece by J. Dale Shoemaker](#)
- Your comment should clearly state your position on the proposed incentives and the project. I.e, "I oppose the proposed incentives for Project Potentia and the development of Project Potentia by GCEDC."
- Your comment can address one or all three of the applications: Project Potentia, Project Rampart, and Project Double Stream
- Please include our core demand:
 - I demand that GCEDC hold a new set of public hearings scheduled in consultation with the Tonawanda Seneca Nation Council of Chiefs at least a month in advance and on a weekday evening.
 - See [Demands to include in written comments](#) for our other demands
- Written comments can be sent to GCEDC at gcedc@gcedc.com with the subject line "Project Potentia/Rampart/Double Stream." **Deadline: 5pm on February 6, 2025**

General Talking Points on Impacts of Data Centers (applicable to all three projects)

[Data Center 101](#)

[Big data centers, big problems - Report by Environment America](#)

- Overall environmental impact
 - Data centers have large environmental footprints because of their significant energy consumption, greenhouse gas generation, water consumption, wastewater production as well as harmful noise, light, and air pollution.
- Energy use
 - Data centers demand immense amounts of electricity, both for running servers and for data processing, especially for tasks like machine learning training. The data centers proposed for STAMP would use between 195-250 MW per year. In WNY, this is roughly equivalent to the power used by 40,000 homes in a year.
 - The use of hydropower generated from the Niagara River to power a data center at STAMP squanders our precious regional fresh water.
- Noise
 - Equipment at Data Centers emit continuous noise comparable to a jet engine. Scientific research establishes a link between excessive noise exposure & public health harms including:
 - Headaches and sleep disturbance: The constant humming or buzzing from data centers can cause headaches, stress, and sleep disturbance.

- Tinnitus and hearing loss: In more extreme cases, noise pollution can cause tinnitus and hearing loss.
 - [See this local example of a community that opposes data centers based on noise](#)
 - None of the three data center applicants has conducted a comprehensive, meaningful noise study. Instead they downplay or obscure altogether potential noise impacts.
- Impacts to wildlife
 - Noise pollution can disrupt animal communication and force them to seek new migration patterns. Noise from the data centers would affect wildlife in the Tonawanda Seneca Nation's Big Woods, where Nation citizens practice subsistence hunting of deer and other species.
 - None of the data center applicants consider impacts to the thousands of migratory birds that pass through the area.
 - The data center applicants also do not address noise impacts to threatened, rare, and endangered species found in the area. These species include the Short Eared Owl, Northern Harrier Hawk, Bald Eagle, and Sandhill Cranes
- Energy grid strain
 - Data centers also strain power grids, creating vulnerabilities for neighboring communities. Data centers are connected with increased incidence of brownouts and blackouts because of their massive energy use, which can lead to power outages at times of peak usage in the summer and winter.
 - Strain on the grid can lead potentially to consumer rate raises.
- Air Pollution
 - Data Centers are associated with air pollution due to their reliance on backup generators that use diesel fuel.
 - All of the data center applicants at STAMP would rely on backup diesel generators. The diesel, ranging from 60,000 to 150,000 gallons, would be stored onsite. All of the applicants acknowledge emissions and the need for air permits.
- E-waste
 - Data centers also require hardware components like servers, routers, and cables, all of which can quickly become outdated, leading to ongoing electronic waste (e-waste). E-waste cannot easily be cleaned up, disposed of, or stored.
 - Many components contain hazardous materials like lead and mercury, as well as ammonia, chlorine, and acids. Dumping and improper disposal can contaminate nearby soil and water.
 - Cryptocurrency operations are specifically associated w PCB contamination and other toxic waste.
 - None of the applicants outlines a meaningful plan for disposal of the e-waste that would be created onsite.
- Water usage
 - Data centers require continuous cooling mechanisms to maintain optimal operating temperatures and prevent hardware failure. Most data centers rely on huge amounts of water to cool their systems. The most common method of cooling, called water-based cooling, uses vast amounts of water.

- Potentia would use 28,000 gallons of water per day. Double Reed would use 10,000. Rampart claims it would need no water whatsoever for cooling and just 3,675 gallons per day for typical employee water usage.
- In order to meet the water needs of STAMP tenants, particularly a data center, GCEDC proposes to construct an inflow pipeline that would carry up to 6 MGD of water from the Niagara River to the site. The use of this water to cool a data center at STAMP squanders our precious regional fresh water.
- Heated water discharge
 - Because they use water to cool their hardware, data centers produce superheated water as effluent. This is typically discharged into nearby waterways, raising ambient water temperatures
 - While none of the data center applications discusses heated water discharge at all, the massive “stormwater retention ponds” included in each project’s plans (Double Reed’s ponds would cover 20 acres) appear to be intended as cooling ponds
 - The environmental repercussions on aquatic life and water bodies can be profound, particularly when water is reintroduced to its source at heightened temperatures or mixed with chemicals.
 - Discharge of heated water into water bodies near to STAMP would impact the Tonawanda Seneca Nation’s waterways and the Oak Orchard River coldwater sportfishing industry
 - [The Greenridge cryptocurrency facility](#) discharges 108 degree effluent directly into Seneca Lake, with harmful negative impacts to local ecologies
- Danger of fires and explosions
 - Improper handling of data center electrical equipment or overloading of circuits can lead to short circuits and fires.
 - Onsite storage of large volumes of diesel fuel needed to power backup generators is also associated with elevated risk of fire and explosion
- Impact to wetlands
 - The STAMP site lies at the heart of a vast wetlands complex connected to the Tonawanda Wildlife Management Area, Iroquois National Wildlife Refuge, and Tonawanda Seneca Nation reservation territory. These protected lands provide critical ecological benefits like carbon sequestration, flood mitigation, and habitat preservation. Industrial runoff, hydrological disruptions, and heated water discharge from a data center would devastate these fragile systems.
 - Specifically, the sites under consideration by the three projects would be located on and near extensive wetlands and adjacent to the Tonawanda Seneca Nation’s Big Woods and the Tonawanda Wildlife Management Area.
 - Onsite diesel fuel storage – 1.5 million gallons in the case of Project Rampart – present particularly grave risks to wetlands and waterways in the region
 - The parcel contains multiple tributaries that would need to be rerouted.
- Stormwater management and increased risk of flooding

- All three data center applicants propose creation of additional impervious surface cover, which would lead to increased runoff onto surrounding downstream areas - including the Tonawanda Seneca Nation
- Increased impervious surface area raises the risk of flooding
- Each data center site plan shows massive stormwater retention ponds which, in a storm or high water event, would overflow onto Tonawanda Seneca Nation land and protected areas like the TWMA. One project, Rampart, acknowledges direct discharge from stormwater retention ponds into tributaries and wetlands.
- Impacts to regional conservation efforts
 - Putting a data center at STAMP also contradicts the [New York State and national 30x30 initiatives](#) and the [Western New York Wildway conservation strategy](#). These programs aim to protect critical ecosystems, not degrade them, and to combat climate change, not exacerbate it
- Violation of the 2019 Climate Leadership and Community Protection Act (CLCPA)
 - All three data center proposals would violate the CLCPA, which should safeguard against the siting of polluting facilities near “Disadvantaged Communities” such as the Tonawanda Seneca Nation
- Violation of the 2025 Environmental Conservation Law Section 70-0118
 - All three data center proposals violate the Environmental Justice Siting Law because they would place a disproportionate pollution burden on the Tonawanda Seneca Nation. This law, which went into effect on December 30, 2024, prohibits agencies from supporting such projects.
 - Development of this parcel would be a profound environmental injustice. It is outrageous that millions in state subsidies - ie, taxpayer dollars - would go to fund a private industrial development project with such obviously massive and negative impacts on the Nation and public protected lands.
- Lack of transparency
 - To date, GCEDC has failed to disclose the identities of the companies represented by the data center investor groups, provide dollar figures for proposed tax breaks, or require the data centers to publicize the full range of impacts they will have. It is impossible for the public to meaningfully assess the proposed financial incentives without knowledge of the specific companies involved and the types of operations they would conduct
- Violation of sovereignty and impacts to the Tonawanda Seneca Nation
 - Noise pollution, water consumption, and habitat destruction from the proposed projects threaten the Nation’s subsistence practices, ceremonial activities, and environmental health. Proceeding with this development disregards their citizens’ rights, voices, and well-being, further perpetuating systemic inequities.
 - The NYS Department of Environmental Conservation has stated that the SEQR environmental review processes for [Project Hydroscale](#) and [Project Rampart](#) should take impacts to the Tonawanda Seneca Nation into consideration. All three data center EAFs fail to assess impacts to the Nation from the proposed projects.
- Violation of public process

- GCEDC has failed to provide the public with information concerning the proposed financial incentives being offered to the three data center applicants. It is impossible for the public to meaningfully assess the merits of these incentives without the opportunity for prior review of these incentives
- Failure to fulfill the mission of STAMP
 - STAMP was intended to attract advanced manufacturing tenants and to advance regional economic development. The website claims that "STAMP is a green manufacturing mega-site." The projects in question are not advanced manufacturing operations, they are not green, nor would they advance regional economic development. GCEDC, as a public entity that has received \$410 million to date in taxpayer subsidies, must be held accountable to its commitments
 - GCEDC has publicly acknowledged that they are pursuing data centers as tenants because they have been unable to attract the advanced manufacturing tenants that STAMP was created to host.
 - They have also acknowledged that data centers do not create jobs while utilizing significant energy resources on a site that lacks sufficient energy infrastructure to support multiple energy intensive operations.
- Violation of General Municipal Law
 - The applicable General Municipal Law requires GCEDC to produce a "written cost-benefit analysis by the agency that identifies the extent to which a project will create or retain permanent, private sector jobs; the estimated value of any tax exemptions to be provided; the amount of private sector investment generated or likely to be generated by the proposed project; the contribution of the project to the state's renewable energy goals and emission reduction targets as set forth in the state energy plan adopted pursuant to [section 6-104 of the energy law](#); the likelihood of accomplishing the proposed project in a timely fashion; and the extent to which the proposed project will provide additional sources of revenue for municipalities and school districts; and any other public benefits that might occur as a result of the project"
 - GCEDC has failed to produce such a cost-benefit analysis and thus these hearings are insufficient as a venue in which to solicit public comment
 - Taxpayer dollars should not go to projects that endanger human health, degrade environmental quality, violate state laws such as the CLCPA and Environmental Conservation Law Section 70-0118, and fail to provide public benefit.

Demands to include in written and oral comments:

Core demand:

"I am writing to demand that GCEDC hold a new set of public hearings on the proposed data center financial incentives. The hearing must be scheduled in consultation with the Tonawanda Seneca Nation Council of Chiefs, at least a month in advance, and on a weekday evening."

Additional demands:

- GCEDC must produce the written cost-benefit analysis of Projects Potentia, Rampart, and Double Reed as stipulated in the General Municipal Law, must widely circulate this

report, and must hold another round of public hearings with significant advance notice to the public and at a time that accommodates the involvement of people who work a standard 9am-5pm schedule

- GCEDC must immediately disclose the identity of the owners/operators of the projects
- GCEDC must publicly provide the completed applications required by GMU 589-a(4) and the uniform criteria for evaluation and selection of projects required by GMU 589-a(5)
- GCEDC must ensure that the project applicants carry out a third-party verified robust, comprehensive noise study of their project and widely publicize the results
- In all aspects of public process pertinent to the projects, GCEDC must follow the new Environmental Justice Siting Law, which prohibits projects that impose disproportionate pollution burdens on disadvantaged communities like the Tonawanda Seneca Nation
- In all aspects of public process pertinent to the projects, GCEDC must follow CP-29 on Environmental Justice and provide enhanced public participation opportunities to the Tonawanda Seneca Nation and the public at large
- Overall: these public hearings are flagrantly inadequate and illegal; constitute a violation of the public trust; and manifest an utter lack of regard for the impact of these proposed projects to the Tonawanda Seneca Nation, residents of WNY, and regional ecologies. GCEDC must address these failures of process and hold a new round of hearings.

Example comment (from one click tool):

To: gcedc@gcedc.com, mmasse@gcedc.com, mustang56pz@gmail.com,
zarley21@gmail.com, paul.battaglia@battagliacpa.com, czkemp@aol.com,
craig@cyfarms.com, kathleenmanne@gmail.com, Marianne.Clattenburg@co.genesee.ny.us
Subject: Proposed incentives for Projects Potentia, Rampart, and Double Reed

Dear GCEDC CEO Mark Masse, Board of Directors Chairman Peter Zeliff, Board of Directors Vice Chair Matthew Gray, Board of Directors Member Paul Battaglia, Board of Directors Member Chandy Kemp, Board of Directors Member Kathleen Manne, Board of Directors Member Craig Yunker, and Board of Directors Legislative Liaison Marianne Clattenberg:

First, I am writing to demand that GCEDC hold a new set of public hearings on the proposed data center financial incentives. The hearing must be scheduled in consultation with the Tonawanda Seneca Nation Council of Chiefs, at least a month in advance, and on a weekday evening.

Second, pursuant to General Municipal Law 859-a, I am writing to oppose the proposed financial incentives for Projects Potentia, Rampart, and Double Stream.

The applicable General Municipal Law requires GCEDC to produce a "written cost-benefit analysis by the agency that identifies the extent to which a project will create or retain permanent, private sector jobs; the estimated value of any tax exemptions to be provided; the amount of private sector investment generated or likely to be generated by the proposed project; the contribution of the project to the state's renewable energy goals and emission reduction targets as set forth in the state energy plan adopted pursuant to [section 6-104 of the](#)

[energy law](#); the likelihood of accomplishing the proposed project in a timely fashion; and the extent to which the proposed project will provide additional sources of revenue for municipalities and school districts; and any other public benefits that might occur as a result of the project."

In addition, the law requires GCEDC to identify the owner/operator of the facility to the public.

GCEDC has failed to produce such a cost-benefit analysis or inform the public of the data center's identity and thus these hearings are insufficient as a venue in which to solicit public comment. The Projects' proposed energy and water usage, as well as projected emissions, clearly violate the state's renewable energy goals and emission reduction targets.

Additionally, I am writing to issue the following demands:

- GCEDC must produce the written cost-benefit analysis of Projects Potentia, Rampart, and Double Stream as stipulated in the General Municipal Law and must widely circulate this report;
- GCEDC must immediately disclose the identity of the owners/operators of Projects Potentia, Rampart, and Double Stream;
- GCEDC must publicly provide the completed applications required by GMU 589-a(4) and the uniform criteria for evaluation and selection of projects required by GMU 589-a(5);
- GCEDC must ensure that the three developers carry out third-party verified robust, comprehensive noise studies of Projects Potentia, Rampart, and Double Stream and widely publicize the results;
- In all aspects of public process pertinent to Projects Potentia, Rampart, and Double Stream, GCEDC must follow the new Environmental Justice Siting Law, which prohibits projects that impose disproportionate pollution burdens on disadvantaged communities like the Tonawanda Seneca Nation;
- In all aspects of public process pertinent to Projects Potentia, Rampart, and Double Stream, GCEDC must follow CP-29 on Environmental Justice and provide enhanced public participation opportunities to the Tonawanda Seneca Nation and the public at large.

GCEDC's February 3, 2025 public hearings were flagrantly inadequate and illegal; constitute a violation of the public trust; and manifest an utter lack of regard for the impact of data centers on the Tonawanda Seneca Nation, residents of the Great Lakes bioregion, and the health and well-being of our shared environment. GCEDC must hold a new set of public hearings scheduled in consultation with the Tonawanda Seneca Nation Council of Chiefs at least a month in advance and on a weekday evening.

Sincerely,

Your Name

City, State

Project Snapshots - [Environmental Assessment Form \(EAF\) Comparison chart](#)

Project Potentia (previously “Hydroscale”)

[Design Documents](#)

[Organizational sign-on letter](#)

[Proposed financial incentives](#)

Investor group: [JLL, LLC](#)

Site Plan: Two structures at 450,000 square feet each on a site of 43 acres, six water tanks

Water and power usage: Potentia site plans show water tanks holding nearly two million gallons of water would be required to serve the facility. The EAF, however, claims Potentia would use 28,000 gallons of water per day and would require 195 megawatts of electricity per year. No recycling of wastewater is planned.

Wetlands and waterbodies impacts: The EAF claims no impacts to wetlands and that 100% of the soils onsite are “well-drained” but also claims that regulated wetlands are present on an adjoining parcel with no information pertaining to regulation of this wetland.

Surface area change: The EAF claims that development of Potentia will require creation of 25 acres of impervious surface area.

Stormwater management: The EAF states this will be achieved using onsite retention ponds, although the application also claims that the project will not require impoundment of water

Onsite power generation and air pollution: The EAF states that Potentia will use an estimated 1,285,050 gallons of diesel fuel per year and will generate 14,622 tons/year (short tons) of CO2 in emissions. The EAF states that air permits are needed but does not specify. Potentia will store 700,000 gallons of diesel fuel onsite, raising questions about contamination of ground and surface waters.

Waste: The EAF contains no answers to operations waste questions, just form language about striving to avoid waste

Noise: The application provides no information whatsoever about operational noise, but states that “noise during construction will be comparable to any large construction project”

Presence of listed species: EAF acknowledges presence onsite of NYS listed rare and threatened species - Northern Harrier and Short Eared Owl

Notable company info: In 2024, high ranking employees of JLL pled guilty to conspiracy charges associated with a multiyear effort to engage in [fraudulent loan activities](#)

Project Rampart

[Design Documents](#)

[Organizational sign-on letter](#)

[Proposed financial incentives](#)

Investor group: [PRP REI](#)

Site Plan: One structure at a total of 750,000 square feet on a site of 67 acres.

Water and power usage: The revised application indicates that Rampart would use no water whatsoever, aside from 3,675 gallons per day for typical employee water usage. The original

application indicated a need for 800,000 gallons of water per day. Rampart would require 200 MW of electricity / year.

Wetlands and waterbodies impacts: Rampart claims no impacts on wetlands or waterbodies but includes plans to discharge directly into tributaries and wetlands.

Surface area change: Claims Rampart will create 28 acres of impervious surface area.

Stormwater management: Rampart's 7.7 acre onsite stormwater pond would discharge directly into tributaries and wetlands

Onsite power generation and air pollution: The revised EAF acknowledges air emissions from backup power generation requiring bulk storage of 1.5 million gallons of diesel fuel, raising questions about contamination of ground and surface waters, but claims no air permits are required and reports zero projected air emissions. The original application stated that 1,471,586 tons/yr CO₂, 441 tons/yr N₂O, 88 tons/yr Hazardous Air Pollutants would be created, numbers that were deleted in the revised EAF.

Waste: Claims 19 tons/year solid waste (commercial trash); no hazardous waste

Noise: EAF states that there is a "potential for low level noise from building equipment"

Presence of listed species: EAF acknowledges presence onsite of NYS listed rare and threatened species - Northern Harrier and Short Eared Owl

Notable company info: The company [publicly accused GCEDC](#) of engaging in an unfair competitive process that put their application at a disadvantage.

Project Double Reed

[Design Documents](#)

[Organizational sign-on letter](#)

[Proposed financial incentives](#)

Investor group: [Stream Data Centers](#)

Site Plan: 3 total structures, the largest of which would be 41 x 450 x 850. The total building space to be heated / cooled would be 900,000 square feet. The total site would be 60 acres.

Water and power usage: Revised EAF acknowledges Double Reed would use 10,000 gallons of water per day for sanitary processes but provides no information about operational water use or onsite water storage. Double Reed would require 250 MW of electricity per year. No recycling of wastewater is planned.

Wetlands and waterbodies impacts: The EAF claims no impacts to wetlands or water bodies. However, project site plans show multi-story structures built up to the borders of two regulated wetlands. Further, the EAF claims 93.9% of site is "moderately well- drained"; 0.5% "well drained", 5.6% "poorly drained."

Surface area change: EAF claims Double Reed will create 39 acres of impervious surface area.

Stormwater management: The site would create twenty acres of discharge ponds. Double Reed's EAF claims these ponds would discharge west to east, to pipes along Crosby Road, but natural flow onsite is east to west.

Onsite power generation and air pollution: Double Reed would maintain onsite diesel generators using 60,000 gallons of diesel fuel per year, according to the EAF, and producing emissions of 533 tons of Co₂, as well as possible N₂O and HAP emissions. Double Reed has not disclosed the number of diesel fuel generators planned as part of the project but notes each generator will use a "belly storage tank" holding 9,500 gallons. Double Reed would require NYS air permits

Waste: Claims Double Reed will generate 120 tons of waste per year

Noise: The EAF provides no information regarding operational noise levels, aside from acknowledging there will be noise impacts during “infrequent” power outages, when diesel generators must be used. It names construction noise: “heavy equipment operation, materials bending and dumping, possible riveting and jackhammering”.

Presence of listed species: EAF acknowledges presence onsite of NYS listed rare and threatened species - Heartleaf Plantain, Least Bittern, Horned Lark

Notable company info: Stream Data Centers claims stated commitments to environmental sustainability, social responsibility, and long-term stewardship. Stream Data Centers claims it is committed to aligning its projects with the United Nations Sustainable Development Goals (SDGs), including clean water, affordable clean energy, responsible consumption, and climate action.