



617 Main Street · Suite 300 Buffalo, NY 14203 · www.wnyea.org

February 14, 2024

Secretary Deb Haaland, US Department of Interior
Honorable Kathy Hochul, Governor, New York State
Commissioner Basil Seggos, NYS Department of Environmental Conservation

RE: STAMP project in Genesee County

Dear Secretary Haaland, Governor Hochul, and Commissioner Seggos:

This letter is to advise you of the great costs, uncertain benefits, and growing public disapproval of the STAMP project in Genesee County. The Genesee County Economic Development Center (GCEDC) has received over \$400M in public subsidies to develop STAMP (Science, Technology and Advanced Manufacturing Park) in a rural area with little urban or industrial infrastructure. The 1,250-acre site is surrounded by the 10,000-acre Iroquois National Wildlife Refuge (INWR), by another 10,000 acres of state wildlife areas, and by the sovereign territory of the Tonawanda Seneca Nation (TSN). Permits have been approved to destroy habitat for endangered and threatened species known to occupy the site, and to run an industrial wastewater pipeline through the INWR despite overwhelming public opposition and mounting legal challenges. (See Orleans County v. GCEDC 9/11/23 and TSN v. US Fish and Wildlife Service 11/29/23)

After over 12 years in the making, STAMP's only fully committed tenant is Plug Power, maker of hydrogen fuel cells, a dubious source of green energy given its distance from water, sewer, power, labor forces, and markets. Plug Power alone has received \$270M in taxpayer subsidies for the promise of 68 jobs, at a cost of about \$4 million per job. Meanwhile, recent reports quote the company's "substantial doubt about its ability to continue as a going concern" with the *Buffalo News* reporting STAMP as Buffalo-Niagara's biggest business loser in 2023. Two years ago a State smart growth-good government analysis called STAMP "a poster child of *location inefficiency*," on the basis that "location efficiency is the essential element for successful economic development." Nevertheless, the latest \$56M subsidy under FAST-NY (Focused Attraction of Shovel Ready Tracts) continues to ignore not only location efficiency, but also the value of existing surrounding land uses. This sets a poor direction for our future, destroying an opportunity to learn and cultivate a conservation ethic and practice with those who have the deepest knowledge of this land and the life it supports.

By this letter, we call on you to pursue another way forward—a way that is consistent with the State's proclaimed goals of conserving native ecosystems and species, building back climate resilience, and respecting Indigenous rights. Regional and international conservation plans have mapped this area as a priority for protection based on its high biodiversity and climate resilience values and its potential for connectivity among the surrounding natural areas. Many are calling for New York State's Open Space Plan to embrace the State's 30 by 30 bill (30% protected natural land by 2030) beginning with such high-priority areas. (See attached maps)

STAMP seriously undermines New York State's open space and species protection goals as well as its commitments requiring consultation with Indigenous neighbors on developments that might affect them. The Tonawanda Seneca Nation is now suing the US Fish and Wildlife Service in federal court for permitting STAMP wastewater pipeline construction through the INWR after spills of hundreds of gallons of drilling fluid into the wetland. We need robust public education and jobs based on protecting the value of the natural wealth that exists here. Natural lands and waters are an inalienable public good necessary to the survival of current and future generations.

Many now say that STAMP was a mistake. It should never have been planned for so unsuited a place. When we add up the negative impacts on fish and wildlife, climate resilience, the Tonawanda Seneca community, and the State's economy (@\$4M per job?!), STAMP as currently envisioned is taking us down the wrong road. The costs are too great; the benefits far too uncertain.

Some say that STAMP is too far along to stop. But as of yet, little industrial development has actually occurred there. Most of the 1,250 acres remain natural enough to host endangered species like the Short-eared owl, now down to less than 100 individuals in the entire State. It is not too late to invest in the true value of this land. We all need our natural world to survive intact. Help lead us to a sustainable, healthy and just future. Rethink the STAMP project now!

More on the ecological value of the STAMP site

The STAMP site is located along the eastern boundary of the Tonawanda Seneca Nation (TSN) territory--about 7,500 acres of rural land including what the DEC's Natural Heritage Program has identified as the most significant floodplain-wetland complex in NYS. This land also includes the "Big Woods," a mature forest that has been maintained and used for centuries by Haudenosaunee across the state for hunting and for gathering medicine plants. Despite this importance to our natural heritage and to Haudenosaunee traditional culture, testimonies such as this by biologist, author, and teacher Robin Kimmerer, have yet to be heard:

"I recently had the privilege of walking through the Big Woods with Tonawanda Seneca Nation citizens and fellow scientists under a towering canopy of immense oaks, maples, and basswoods. On that lush summer day, thrushes, thrashers, and rare warblers sang above as we traipsed through ferny glades, the earth soft with centuries of leaf fall and carpeted with more wildflowers than I've ever seen in many years of botanizing. So rich is this territory that Chief Kevin Jonathan calls it 'one of the most important hunting and gathering areas for the entire Haudenosaunee Confederacy.'" READ MORE at <https://www.yesmagazine.org/opinion/2023/11/01/ny-native-stamp-seneca>

Sincerely,

Western New York Environmental Alliance (WNYEA)
John Whitney, Chairperson whitneyjohnr@gmail.com

WNYEA STAMP Campaign:
Margaret Wooster, miwooster@gmail.com
Lynda Schneekloth, lhs1@buffalo.edu
and several hundred more . . .

. . . Please open these links to the 28 other organizations and 165 individuals who have signed on to this letter and added their own concerns, some of which are highlighted to show the variety and scope of damages that would occur with STAMP build-out:

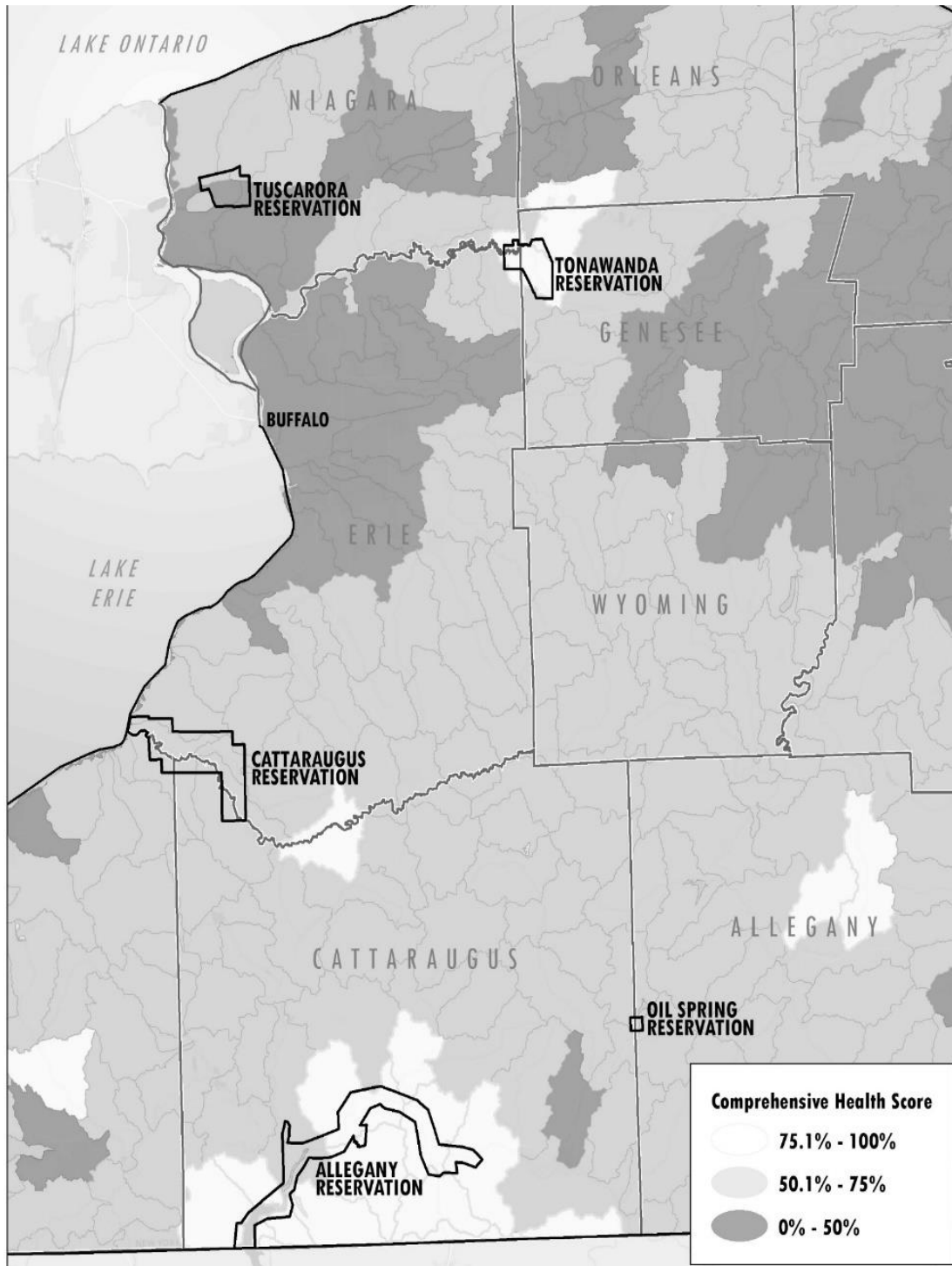
Organizations: <https://shorturl.at/puOSU>

Individuals: <https://tinyurl.com/rethinkSTAMPindividuals>

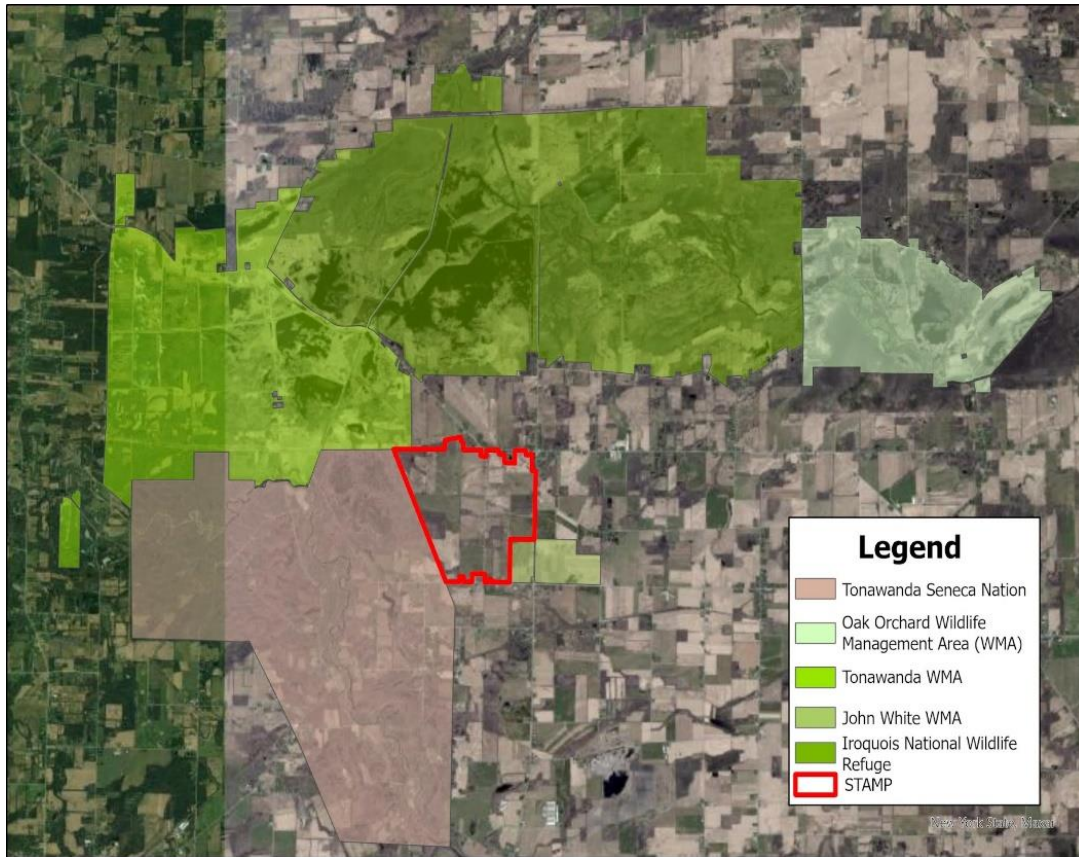
Also see attached maps.

Cc: Michael Regan, Administrator, USEPA
Lisa Garcia, US EPA Region 2 Administrator
Heidi Todacheene, Senior Advisor to Secretary of Interior
Martha Williams, Director, USFWS
Tom Roster, Manager, USFWS Iroquois National Wildlife Refuge
Alex Page, Attorney for Tonawanda Seneca Nation
Charles Schumer, US Senator for NY
Kirsten Gillibrand, US Senator for NY
George Borrello, NYS Senate, District 57
Sean M. Ryan, NYS Senate, District 61
Timothy M. Kennedy, NYS Senate, District 63
Rachel May, NYS Senate, District 48
Samra Brouk, NYS Senate, District 55
Kristin Gonzalez, NYS Senate, District 58
Neil Breslin, NYS Senate, District 46
Shelley Mayer, NYS Senate, District 37
Pat Burke, NYS Assembly, District 142
Steve Hawley, NYS Assembly, District 139
Crystal Peoples-Stokes, NYS Assembly, District 141
Jon Rivera, NYS Assembly, District 149
Bonnie Lockwood, Governor Hochul WNY regional representative
Timothy Walsh, Director Region 8 DEC
Thomas Haley, Region 8 Permits Administrator, DEC
Julie O'Neill, Director Region 9, DEC
Peter Reuben, Director, Office of Indian Nation Affairs, DEC
Adriana Espinoza, Deputy Commissioner for Equity and Justice, DEC
Allanah Keddell-Tuckey, Director, Office of Environmental Justice, DEC
Thomas DiNapoli, NY State Comptroller

MAPS



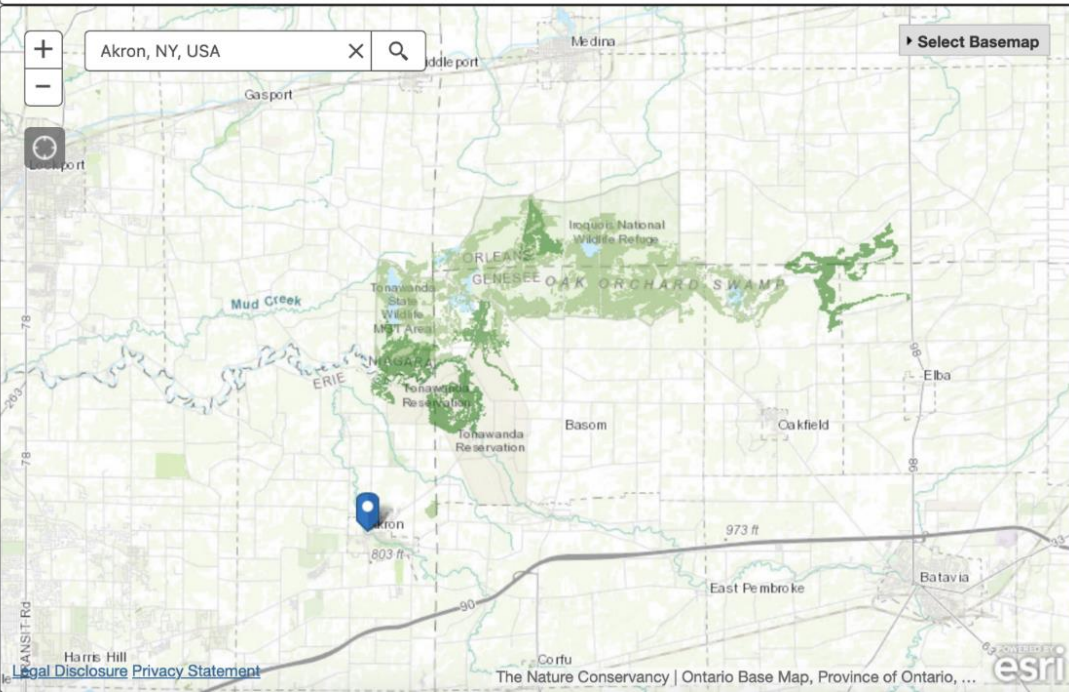
WNY's healthiest streams are often associated with Haudenosaunee lands.
Source: DEC Natural Heritage Program: *Riparian Opportunities Assessment*



“We are responsible for protecting our land, community, and future generations from the harms brought on by industrial development. The industrialization of the STAMP site is not just an environmental concern but a matter of human rights for the Nation.” Chief Roger Hill, TSN



Plug Power, the only “shovel-ready site” at STAMP, has over \$300M in public subsidies, but doubts its ability to be a ‘going concern.’ A Smart Growth study blames *location inefficiency*.



Another way is to work with the natural value of this landscape . . .

