

SUPREME COURT  
STATE OF NEW YORK      COUNTY OF TOMPKINS

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In the Matter of the Application of

FLX STRONG by its President Kenneth Wolkin and CAYUGA  
LAKE ENVIRONMENTAL ACTION NOW by its President John  
V. Dennis,

**AFFIRMATION OF  
MAUREEN COWEN**

Index No.:

Petitioners,

For a Judgment Under Article 78 of the Civil Practice Law And  
Rules,

vs.

TOWN OF LANSING ZONING BOARD OF APPEALS,  
TERAWULF INC., CAYUGA OPERATING COMPANY LLC,  
LAKE HAWKEYE LLC, and FRED DELFAVERO,

Respondents.

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I, Maureen Cowen, of legal age, affirm under penalty of perjury pursuant to N.Y. C.P.L.R.

§ 2106 the following:

1. I am a resident of the Town of Lansing and reside with my husband at 699 Lansing Station Road.
2. I am a member of FLX Strong.
3. We have owned the property at 699 Lansing Station for decades but moved here as permanent residents 11 years ago.
4. We live just over a mile from the Milliken Station site where the proposed data center is proposed.

5. Our property is south of Milliken Station and has waterfront access. My husband and I and our grandchildren use our property to access Cayuga Lake for boating, kayaking, fishing, and other on-water activities.

6. While Milliken Station was operated as a power plant, we could hear the operations at the site from our residence depending on what activities were occurring there.

7. I'm very concerned that the data center's continuous humming and noise will negatively affect the enjoyment and use of our home at 699 Lansing Station.

8. The noise from a data center will be aggravating and reduce our ability to enjoy the outdoors at our property. In my experience, noise carries easily across the Lake near our property, so I fear that the noise from the data center will be even more pronounced when we are boating and kayaking and swimming during the warmer months.

9. I am also afraid that the constant noise from a data center at Milliken Station could be heard from within our home and intrude on our peace and quiet. I understand that the low frequency noise from a data center can be heard within the homes, even with windows shut. I am concerned that the constant hum from the data center will be a source of physical and mental stress and disturb my sleep.

10. We can see the existing Milliken Station from the outdoors of our property, including its red flashing lights at night. An increase in ambient light or any nighttime glow from the area of the facility could be detrimental to my ability to sleep. I am a light sleeper.

11. My husband and I are also birders. We have birded for 10 years and belong to local birding groups in the area.

12. We enjoy birding throughout the year but particularly during the Spring and then again in the Fall and Winter.

13. We regularly visit nearby areas for birding, including Cayuga Shores Wildlife Management Area (Bell Station) and the former Cedar View golf course area, just north of Bell Station, and Cayuga Cliffs, which is to the south of our property. We will sometimes kayak to Bell Station from our residence in order to observe birds and wildlife.

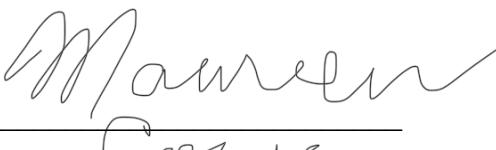
14. An increase in industrial noise and light pollution in these places from a new data center will lessen my enjoyment of birding at these places and force me to consider traveling further for quality birding.

15. I am also concerned about the significant energy use of the proposed data center and its impact on local grid reliability. Sometimes the power at our residence will go off and on, without any obvious reason. I'm concerned that increase energy demand from the facility could increase the occurrence of such events.

16. I am also concerned about the water quality in the areas of the Lake we recreate in. If the facility increases stormwater runoff or pollutants as a result of construction or site excavation or grading, it could negatively impact the water quality in Cayuga Lake and our ability to swim and fish there.

**CI2026-02336****Index #: EF2026-0069**

Pursuant to N.Y. C.P.L.R. 2106, I affirm this 27th day of January 2026, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.



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Maureen Cowen