

MANAGEMENT LETTER

December 18, 2024

The Board of Directors and Management
Niagara County Brownfield Development Corporation

In planning and performing our audit of the financial statements of Niagara County Brownfield Development Corporation (NCBDC) as of and for the year ended September 30, 2024, in accordance with auditing standards generally accepted in the United States of America, we considered NCBDC's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of NCBDC's internal control. Accordingly, we do not express an opinion on the effectiveness of NCBDC's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis.

Our consideration of internal control was for the limited purpose described in the first paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses. In addition, because of inherent limitations in internal control, including the possibility of management override of controls, misstatements due to error or fraud may occur and not be detected by such controls. Given these limitations, during our audit, we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

This communication is intended solely for the information and use of NCBDC's management and Board, the County of Niagara, and the United States Environmental Protection Agency. It is not intended to be, and should not be, used by anyone other than these specified parties.

Lumsden & McCormick, LLP