

B. LAING ASSOCIATES

ENVIRONMENTAL CONSULTING
www.blaingassociates.com

103 Fort Salonga Road - Suite 5 Fort Salonga, NY 11768
(631) 261-7170, Fax: (631) 261-7454

January 9, 2023

Kenneth Kovalchik, AICP
Town Planner
Guilderland Town Hall – 2nd Floor
5209 Western Turnpike
P.O. Box 339
Guilderland, NY 12084

Re: Reclassification of Northern Long-eared Bat (*Myotis septentrionalis*) in Regard to Proposed Development at Crossgates Mall, Town of Guilderland, Albany County

Mr. Kovalchik,

B. Laing Associates is the environmental consulting firm which has provided Pyramid Management Group and Rapp Road Development, LLC (“Pyramid”) with ecological and environmental services with regard to projects/developments at, and in the vicinity of, Crossgates Mall over the last several decades. Our environmental services included extensive participation in the recent SEQRA review and Environmental Impact Statement for the Rapp Road Residential/Western Avenue Mixed Use Redevelopment Project.

Pyramid has asked us to review the SEQRA record and our findings in light of the recent reclassification of northern long-eared bat from threatened to endangered under the Endangered Species Act. According to the USFWS, the reason for the reclassification is the ongoing population loss due to the fungal disease known as white-nose syndrome.

Even though the listing of northern long-eared bats as endangered is new, this species was analyzed during all of B. Laing Associates’ reviews of development in the vicinity of Crossgates Mall including the proposed Costco site along Crossgates Mall Road and Western Avenue. As such, this office has considerable data on this species at this location. **To date, B. Laing Associates has not observed or recorded northern long-eared bat on any of the Crossgates Mall sites during the summer breeding season.** In addition, the winter hibernacula that northern long-eared bats use are well studied and monitored for white-nose syndrome, and the locations are well mapped. The closest northern long-eared bat winter hibernaculum to the Crossgates Mall is approximately 7.9 miles to the east.

Based on our review of the SEQRA record for the Costco/Western Ave. Redevelopment Projects, our extensive and long-term work at and in the vicinity of Crossgates Mall, and considering that the primary threat to northern long-eared bats continues to be the white-nose fungus and not tree removal, it is of the opinion of this office that the recent reclassification of the northern long-eared bat does not require further environmental review and the Town of Guilderland should be able to rely on previous findings under the State Environmental Quality Review Act.

Sincerely,

A handwritten signature in black ink, appearing to read 'Taylor Sturm', with a horizontal line drawn through the middle of the signature.

Taylor Sturm
Senior Project Scientist