



**LAKE • GEORGE
WATERKEEPER®**

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July 1, 2008

Mr. Keith Hanchett, Chairman
Town of Lake George Planning Board
Old Post Road
Lake George, NY 12845

Re: Beaulieu (238.18-1-25)
Site Plan #24-2008

Dear Mr. Hanchett:

The Lake George Waterkeeper has reviewed the submission for the above referenced site plan application. We understand the applicant's intention for the construction of a large lake house and compliment the inclusion of stormwater management in the proposal. However, there appear to be numerous areas where the proposal does not meet regulations and we would like to offer the following comments for consideration by the Board:

ON-SITE WASTEWATER TREATMENT SYSTEM (OWTS)

1. The proposed design appears to be a hybrid system and not compliant with standards for absorption beds.

The OWTS appears to be an absorption bed consisting of an Eljen system with the trenches eliminated to reduce the system dimensions due to space constraints. Absorption beds are not permitted on slopes greater than 8%. The system is referred to as a "raised absorption field" which has different design criteria. The system should be accurately identified and designed according to New York State Department of Health Standards.

2. The calculations do not specify a design application rate.

Absorption fields and absorption beds have different application rates, with beds having a lower rate since the surface area of the trench walls are lacking. There is no information provided regarding the absorption rate applied or the soils specified.

3. The system does not meet the required 10' setback to property lines.

4. The raised system is supported by the retaining wall with a drain system which could result in a reduction of treatment and seepage of effluent.

The retaining wall has a 12" gravel layer with a drain pipe within 8 feet of the proposed absorption bed. This detail should be reconsidered.



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STORMWATER MANAGEMENT

- 1. It appears the area of disturbance is greater than 15,000sf. The project should be considered a major project.**
- 2. There are several stormwater controls referenced in the narrative on Sheet 2, such as the drywells for the house and the infiltration trench that are not shown on the plan.**
- 3. The use of infiltration trenches along roads and driveways for stormwater management should be reconsidered.**
Infiltration trenches installed along an impervious surface that will receive direct runoff without any pretreatment or grass swales tend to capture sediment and leaf debris which reduces the effectiveness of the controls. This can be protected by either the use of grass filter strips or the installation of a layer of grass over the infiltration media.

Thank you for your consideration of these comments and we look forward to working with the Town of Lake George Planning Board in defending the natural resources of Lake George and its watershed.

Sincerely,



Christopher Navitsky, PE
Lake George Waterkeeper

cc: Michael White – Lake George Park Commission
Brian Grisi – Adirondack Park Agency