



**LAKE • GEORGE**  
**WATERKEEPER®**

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February 24, 2010

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

**Re: Abrantes (264.03-1-38, 39, 40 & 41)**  
**Site Plan Review 5-2010**

Dear Mr. Hanchett:

The above referenced application was personally reviewed in my capacity as a licensed professional engineer and the Lake George Waterkeeper. The Lake George Waterkeeper requests the Planning Board apply the Town's regulations for site plan review during your deliberations regarding the above referenced application.

**APPLICATION SHOULD BE DETERMINED AS INCOMPLETE**

The project proposes to disturb approximately 1-1/2 acres for the construction of one, single family home and should be considered a major stormwater project. This is recognized in a letter from the applicant's agent. However, no information has been submitted for the stormwater management plan and therefore, the application should be deemed as incomplete.

**STORMWATER MANAGEMENT**

It is noted no stormwater management plan has been prepared. Upon review of the existing sketch plan, we have a number of concerns about the proposed site:

- The plan clears nearly 1/2-acre north of the driveway and directs runoff off site without any stormwater management.
- The plan proposed to install a stormwater basin in a 12-foot cut section. Infiltration rates are significantly reduced at this depth and soils components necessary for treatment of stormwater are missing in deep subsoils.
- The project discharges stormwater to the property to the west after construction where it was not previously discharged.
- The project will discharge uncollected stormwater unto the areas proposed for stormwater management and wastewater treatment of lots of the CEG Development subdivision.
- The proposed driveway is located near the discharge of an existing 12" stormwater culvert. This should be incorporated into the design to mitigate impacts from the discharge on the proposed 33% slopes.



THE FUND for LAKE GEORGE

**ON-SITE WASTERWATER TREATMENT SYSTEM (OWTS)**

The proposed OWTS is proposed on 6 feet of fill. New York State Department of Health regulations prohibit the installation of fill systems on natural slopes exceeding 15%. This system should be redesigned or obtain a waiver from the New York State Department of Health.

In general, these lots were previously reviewed in 2006 for the development and the Planning Board expressed concerns about the grades and runoff from the site. Although the level of development has been reduced to a single family home, the disturbance and grading required to develop the site remains extensive, creating 33% grades with minimal buffer to the adjacent subdivision.

The Lake George Waterkeeper recommends the following: 1) concept plan with reduced disturbance limits that maintains existing grades, topography and vegetation to mitigate impacts of the site development eliminate the 8" lower culvert from the detention basin; 2) submission of a complete stormwater management plan for a major project; 3) an OWTS compliant with New York State Department of Health regulations; and 4) a public hearing when the application is complete.

The Lake George Waterkeeper looks forward to working with the Town of Lake George Planning Board to defend the natural resources of Lake George and its watershed. Thank you for your consideration.

Sincerely,



Christopher Navitsky, PE  
Lake George Waterkeeper

cc: Frank McCoy – Town of Lake George Supervisor  
Michael White – Lake George Park Commission