



**LAKE • GEORGE
WATERKEEPER®**

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February 22, 2010

Ms. Molly Gallagher
Lake George Park Commission
P.O. Box 747
Lake George, NY 12845

**Re: Bhatia – Ticonderoga (T) (160.26-1-1.4)
LGPC Application 1548-20-09**

Dear Ms. Gallagher:

The above referenced application was personally reviewed in my capacity as a licensed professional engineer and the Lake George Waterkeeper. I have had the opportunity to discuss the applicant and potential water quality improvements with Joe Thouin with the Lake George Park Commission and understand the applicant is requesting relief from the Commission regulations for infiltration requirements based on site constraints of clay soils. The Lake George Waterkeeper requests the Commission apply intent of the regulations, which is to maximize the water quality protection within the Lake George watershed during your deliberations regarding the above referenced application.

MAXIMIZE STORMWATER TREATMENT

It is our understanding the Commission's approach is to maximize treatment considering the reduced infiltration at the site. However, infiltration tests indicate the upper 12" of soil has infiltration capabilities and can provide some stormwater treatment.

- 1. The middle culvert discharge should be eliminated to increase filtration and stormwater treatment.** The location of an 8" lower discharge culvert reduces the opportunity for the filtration of the increased stormwater, reducing treatment and promoting the discharge of untreated stormwater. This should be eliminated. This would result in increased filtration through the underdrain and since the pond is utilizing existing grades, this would allow some infiltration, further increasing treatment.
- 2. Planting of wet tolerate native species would increase treatment through vegetative uptake and increasing infiltration potential.**

INCREASE NATURAL SHEETFLOW CONDITIONS

The intent of creating sheet flow would be enhanced through the installation of a perforated pipe header instead of a single 6" outlet over riprap, which results in concentrated flows.

The Lake George Waterkeeper recommends the following: 1) eliminate the 8" lower culvert from the detention basin; 2) plant water tolerant native species in the detention basin; and



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install a short perforated pipe header at the outlet of the filtration underdrain to promote natural sheet flow conditions.

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

Sincerely,

A handwritten signature in black ink that reads "Chris Navitsky". The signature is written in a cursive, slightly slanted style.

Christopher Navitsky, PE
Lake George Waterkeeper

cc: Bruce Young – Lake George Park Commission Chairman
Lake George Park Commissioners
Lee Peters – Town of Ticonderoga Planning Board Chairman