LAKE·GEORGE
WATERKEEPER®

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June 5, 2009

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

Re: Blue Lagoon Resort – 3670 Lake Shore Drive (225.12-1-15)
Site Plan #2-2009

Dear Mr. Hanchett:

The Lake George Waterkeeper has reviewed the revised submission for the above referenced site plan review application. The Waterkeeper recognizes the site constraints referenced by the applicant and their recommendation for non-infiltrative controls to better fit the limiting conditions. However, the stormwater management system could be improved for a large parking area where the proposed stormwater controls do not conform to the Town of Lake George regulations. The Planning Board should also determine if a variance is required for the project. The Waterkeeper offers the following comments:

1. **It is unclear how the proposed stormwater management facilities meet the requirements of the Town of Lake George Code for the reduction of post-development runoff.**
   The Stormwater Management Report states on page 4 "Pocket ponds are utilized for small watersheds where high groundwater prevents infiltration of stormwater into soils". However according to the calculations, the proposed pocket pond will reduce the volume of the 10-year storm event by 25% (0.88 af to 0.66 af). But the plans refer to this pond as "non-infiltrative" so how is the volume reduced? This should be clarified.

2. **There are no calculations based on ground covers provided to verify the pre- and post-development runoff values.**

3. **Cold climate conditions should be addressed.**
   The New York State Stormwater Design Manual recommends an additional foot of freeboard in wet/pocket ponds to account for ice buildup in cold climate conditions. These stormwater controls become ineffective during the winter months where rain events occur more frequently. Also, the ice could build up to block the discharge pipe inside the basin. Attached are photographs of wet/pocket ponds in the Lake George watershed depicting significant ice buildup which significantly reduces the volume available for stormwater management and treatment.

4. **Trees should be planted around the pocket pond to reduce temperature impacts.**
   The water which will be in the pocket pond as well as the runoff from the parking lot surface will be at much higher temperatures than the water in the receiving stream and will impact Lake George with the short distance to travel. Shade trees should be maintained and/or planted around the perimeter of the pond to reduce temperature impacts. In addition, trees/shrubs could be placed in the swales to reduce temperatures and increase the potential for stormwater treatment.

5. **Have soils investigations been performed at the site to determine depth of groundwater?**
   The applicant's response letter stated "test pits will be conducted once weather permits". It seems the weather would not have prevented any soil investigations recently. When will this occur?

The Lake George Waterkeeper encourages the Planning Board to require the maximum stormwater treatment for a parking lot in close proximity to the lake.

Thank you for the consideration. I look forward to continuing to work 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

Photograph of wet pond - Town of Hague subdivision taken on January 30, 2008. Note the freeboard height of the standpipe above the ice elevation.

Photograph of same wet pond – Town of Hague subdivision taken on March 20, 2008. Note that there is no freeboard on the standpipe above the ice resulting in direct discharge of runoff without management or treatment.

Photograph of same wet pond taken on March 11, 2009 during rain event. Note the lack of freeboard on standpipe resulting in direct discharge of runoff during rain event show in adjacent photograph.