



**LAKE • GEORGE  
WATERKEEPER®**

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November 19, 2008

Mr. Herb Koster, Chairman  
**Town of Bolton Planning Board**  
4949 Lake Shore Drive  
Bolton Landing, NY 12814

Re: Diamond Ridge Subdivision – (212.04-2-3,4,5,6 & 12)  
SPR08-01

Dear Mr. Koster:

The Lake George Waterkeeper has reviewed the submitted material for the above referenced site plan review. We would like to offer the following comments for consideration by the Planning Board:

**GENERAL**

**1. Is the proposed plan a reduction in driveway length and disturbance?**

The Lake George Waterkeeper supports the concept for the reduction of disturbance, clearing and impervious coverage. However, the proposal consists of 4400 lf of driveway or almost 900 lf per lot. Would separate driveways for each lot reduce the amount of disturbance? Has a concept plan been submitted? If the applicant is interested in reducing disturbance, another scenario would be locating the building sites at a lower elevation on the sites.

**2. Significant earthwork is required at the house locations for Lots 12, 14 and 15.**

The house site for Lot 15 requires a 14' cut; Lot 14 requires 10' of fill and Lot 12 requires 10' cut. This is significant disturbance for the proposed houses. Since the applicant is proposing to reduce disturbance at the site, alternative house designs should be evaluated that would build the structure to the land and not alter the land to fit the structure. This is an application of Low Impact Development which reduces the amount of runoff attributed to increased clearing and soil alterations. This would also reduce potential visual concerns of the project.

**ON-SITE WASTEWATER TREATMENT SYSTEMS (OWTS)**

**1. The existing slopes prohibit the installation of raised systems.**

New York State Department of Health Regulations Appendix 75-A §75-A.9.b.2 states raised systems may be used where "slopes shall not exceed 15%". Town of Bolton Sanitary Sewage Disposal Ordinance §3.040.B.2 states "The maximum allowable existing natural ground surface slope for built-up systems shall be 10 percent". The existing slopes at the location of the OWTS systems are: Lot 6 – 23%; Lot 12 – 15%; Lot 13 – 15%; Lot 14 – 17% and Lot 15 – 22%. It appears all lots do not comply with the Town of Bolton Code and three do not comply with NYSDOH regulations.

**2. The proposed OWTSs do not provide the required vertical separation to seasonal high groundwater.**

Town of Bolton Sanitary Sewage Disposal Ordinance §3.040.B.5 states "Sufficient fill must be installed to ensure a minimum of three feet between any trench bottom and maximum high seasonal groundwater. None of the OWTS proposed meets this requirement.



THE FUND for LAKE GEORGE

## **STORMWATER MANAGEMENT**

Regarding the proposed stormwater management system, the use of the existing grade to maximize the existing soils is supported. In addition, the use of emended soils in the basins to improve pollutant removal as well as potentially slow the rapid percolation rates to increase treatment is supported.

**1. New York State Stormwater Management Design Manual states the maximum slope for infiltration practices is 15%.**

Many of the proposed infiltration basins are installed on slopes exceeding 15%. Has this plan been submitted to the NYSDEC for a SPDES permit?

**2. There are no pretreatment measures proposed for any of the infiltration basins.**

Pretreatment measures are required by the Town of Bolton Stormwater Management Ordinance (§125-10.B.3.c) as well as the New York State Stormwater Management Design Manual. This removes sediments and other solids which can impact the infiltration capability of the basins.

**3. Design information should be provided for the installation of the check dams for stormwater treatment.**

The Lake George Waterkeeper recommends the Planning Board to request additional information necessary to make a determination if the proposed design will reduce disturbance as well as adequately treat stormwater and wastewater from the proposed development.

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

Sincerely,



Christopher Navitsky, PE  
Lake George Waterkeeper

Cc: Brian Grisi – Adirondack Park Agency  
Michael White – Lake George Park Commission  
Tom Jarrett, PE  
Bill Lupo, PE - NYSDEC