



**LAKE • GEORGE  
WATERKEEPER®**

PO Box 591, Lake George, NY 12845

TEL: (518) 668-5913 Fax: (518)-668-5915

EMAIL: [mfo@lakegeorgewaterkeeper.org](mailto:mfo@lakegeorgewaterkeeper.org)

[www.lakegeorgewaterkeeper.org](http://www.lakegeorgewaterkeeper.org)

October 27, 2008

Mr. Chris Hunsinger, Chairman  
**Town of Queensbury Planning Board**  
742 Bay Road  
Queensbury, NY 12845

Re: Garner Holdings, LLC – Pine Tree Lane (226.19-1-30)  
Site Plan 44-2008

Dear Mr. Hunsinger:

The Lake George Waterkeeper has reviewed the submission for the above referenced site plan application and would like to offer the following comments for the record:

**1. It appears the application is incomplete and fails to list all variances required:**

- §179-6-060.B.1.a.1 prohibits the removal of vegetation within 35 feet of the shoreline of all wetlands and shall be left as an undisturbed natural buffer strip. The project proposes the installation of a well within 2 feet of the wetland boundary. The Code allows for lake access and beaches, neither which applies in this application.
- New York State Department of Health Wastewater Treatment Standards Appendix 75-A Table 2 states "For all systems involving the placement of fill material, separation distances are measured from the toe of slope of the fill". A 10' separation is required between an absorption field and a property line and 20' between an absorption field and dwelling. The project proposes 4' of separation to the property line and 7' of separation to the dwelling from the toe of slope of the fill. In addition, the system should be designed as a four bedroom system to include the proposed den as per NYSDOH standards.

**2. The site exhibits saturated conditions which could impact the ability of the stormwater management facilities to function properly.**

Deep test pit information should be provided in the location of the proposed stormwater management facilities to determine if the soils and separation to seasonal high groundwater are adequate.

**3. There is concern about the extent of disturbance and clearing which will remove the existing protective buffer along the wetlands.**

Based on the size of the proposed dwelling and the infrastructure necessary to support the development (on-site wastewater treatment system, stormwater management, well, parking), it appears the proposed disturbance cannot be mitigated without impacts to the adjoining wetlands, a critical environmental area.

**4. The discharge from the southern Stormwater Pond could result in erosion and should be reevaluated.**

Based on the saturated conditions, there could be the potential for minimal infiltration. In addition, this pond would also collect the runoff from the impervious area associated with access to the site.



THE FUND FOR LAKE GEORGE

Considering these factors, there could be higher discharges than anticipated from this pond which would result in erosion on the steep slope where the discharge is directed. This pond should be reevaluated.

Based on the information submitted, the Lake George Waterkeeper believes the current application poses too much disturbance resulting in adverse environmental impacts to the adjoining wetlands and water quality.

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

Sincerely,

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

Christopher Navitsky, PE  
Lake George Waterkeeper

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