



**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: Gennaro – Ticonderoga (T) (160.26-1-14)**  
**LGPC Application 1548-17-09**

Dear Ms. Gallagher:

The above referenced application was personally reviewed in my capacity as a licensed professional engineer and the Lake George Waterkeeper. I had the opportunity to discuss the application 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. The Lake George Waterkeeper requests the Commission apply the intent of the regulations, which is to maximize the water quality protection within the Lake George watershed during deliberations regarding the above referenced application.

**MAXIMIZE STORMWATER TREATMENT**

The Lake George Waterkeeper recommends maximizing treatment and management of stormwater from land use activities. The applicant's proposal for the construction of the garden trench/biofiltration unit will provide a degree of stormwater treatment. However, it is our opinion the incorporation of the direct underdrain and configuration of the units reduces the potential for contact time with the soil and treatment.

- 1. The garden trench should be redesigned to increase potential contact time with native soils.** It appears clay soils are assumed to be present at the site but no soils investigations have been provided to determine depth of useable soil, impermeable layers, etc. Upper portions of the soils can still infiltrate and provide treatment. If the trench is extended parallel to the shoreline and increase the surface area available for contact with existing soils, this would increase infiltration potential and stormwater treatment, depending on existing soils information.
- 2. The underdrain outlet should be elevated to increase treatment and discourage direct discharge.** Raising the outlet of the underdrain would increase contact time with filter media and soils resulting in increased treatment and potential infiltration.



THE FUND for LAKE GEORGE

### **SHORELINE BUFFER PLANTING**

The site lacks shoreline buffer planting that increase stability of the shoreline and provide further treatment of stormwater runoff from the site. A four-tier canopy native planting should be installed along the shoreline consisting of trees, shrubs, ground cover and forest floor. Please refer to the attached Lake George Fact Sheet on Shoreline Buffers.

The Lake George Waterkeeper recommends the following: 1) adjusting the configuration of the garden trench to increase surface area for potential infiltration; 2) raise the outlet elevation of garden trench/biofiltration unit to increase treatment; and 3) install shoreline buffer planting.

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, flowing 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