



LAKE • GEORGE
WATERKEEPER®

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February 8, 2010

Mr. Galen Seerup, Chairman
Town of Putnam Planning Board
123 Lower Road
Putnam Station, NY 12861

Re: Handley – Black Point Road (1.14-1-6)
8 Lot Subdivision

Dear Mr. Seerup:

The above referenced subdivision application was personally reviewed in my capacity as a licensed professional engineer and the Lake George Waterkeeper. The Lake George Waterkeeper would like to recognize the implementation of Low Impact Development concepts of the proposal including the use of common drives reducing impervious surfaces, clustering of units with reduced lot acreage limiting clearing and disturbance, and the use of rain gardens for stormwater management. The Lake George Waterkeeper would like to offer the following comments to the Board for its consideration:

SUBDIVISION APPLICATION

- 1. Information should be included regarding the density calculations for the proposed number of lots.**
- 2. A more detailed Sequence of Construction should be added to plans.** A sequence of construction is included in the SWPPP but details on the construction of major components of the plan are missing. The Sequence should include: 1) when the rain gardens will be installed – during the initial phase or after lots are sold and homes proposed? and, 2) the time when the access road to the lakefront will be installed – during the initial phase or after lots are sold. In addition, the sequence of construction refers to construction of temporary basins but the plans do not include temporary basins.
- 3. The Planning Board should require Site Plan Review for the development of the individual lots.**
- 4. Plans should include information on seed mixture, which should be specified to be native species.**
- 5. A planting plan should be included consisting of native species.**



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WATER QUALITY IMPACTS

- 1. An undisturbed buffer should be provided along the existing stream for water quality protection.** It appears disturbance is proposed to within 10-15 feet of the stream along the eastern property boundary. This clearing down to 10-15 feet will provide minimal water quality benefits and will negatively impact the water quality of Lake George. Currently, the Lake George Park Commission is proposing 100-foot protective buffers along streams in the watershed for new development. Buffers are important for the removal of pollutants, nutrients and sediment and reduce negative impacts of land use.
- 2. The road should be relocated away from the edge of the wetlands to increase the protective buffer.** Access to a common parking area should be reevaluated and determined if it is a necessity. Buffers are important to nutrient and sediment removal. The existing depth of the lake is limited and the removal of any buffer will result in increased sediments into the wetlands and eventually the lake.

PROPOSED DOCKS

- 1. Information on the calculation of contractual access should be provided.** Contractual access for upland lots is based on lake frontage. There are wetlands located along the shoreline and it should be determined if these unusable lands are allowed to be used for contractual access calculations.
- 2. The applicant should be required to provide a Marina Permit Application to Lake George Park Commission.**
- 3. The applicant should be required to submit docking plans.** Access to the lake will be the main amenity for the upland lots. The depth is very limited and emergent wetlands have been delineated along the shoreline of Tiroga Point to the north. The development of the shoreline cannot be segmented from the remainder of the project.

LOT 1

- 1. The ownership of and easements across the lot should be discussed.** It appears the owner will retain Lot 1 which has two separate access points to Lake George. It also appears purchasers of Lots 2-8 will have lake access through Lot 1. The easement through Lot 1 should be defined for the common lake front, if this is the intent.
- 2. The improvements to the common lakefront property should be detailed.** The plans refer to a beach area but information is not provided. The extent of disturbance should be detailed on common lakefront property. The existing lakefront buffer should be delineated and designated for protection. In addition, any proposals for disturbance of the common property should also include the restoration and improvement of a lakefront buffer for water quality protection. It appears lakefront buffer restoration is proposed on the 0.30 ac. parcel west of Ticonderoga Beach Road but details are not provided.
- 3. The intent of the existing cabins on the uplands of Lot 1 should be discussed.** There are currently six cabins, a bathhouse and outhouse and the proposed use of these structures is not referenced in the proposal. This may have an impact on the proposed density of the development.

The Lake George Waterkeeper recommends the Planning Board table the application and request the following: 1) density calculations for the proposed number of lots; 2) revised information on the proposed construction sequence and timetable for implementation of stormwater management facilities; 3) require a Planting Plan with detailed species information for plants and seed mixtures; 4) require a minimum 100 foot buffer along the stream; 5) require a minimum 100-foot buffer along the wetlands; 6) calculations for the contractual access for the lake; 7) detailed dock plans and a copy of an application to the Lake George Park Commission; 8) detailed development plans of the amenities for the common lake front parcel; and 9) determination about the allowable use of the existing cabins on the south side of Black Point Road.

The Lake George Waterkeeper looks forward to working with the Town of Putnam Planning Board 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: Susan Parker – Adirondack Park Agency
Michael White – Lake George Park Commission
Lee Peters – Town of Ticonderoga Planning Board
Tom Jarrett – Jarrett Engineering, PLLC