



**LAKE • GEORGE
WATERKEEPER®**

PO Box 591, Lake George, NY 12845

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

Email: mfo@lakegeorgewaterkeeper.org

www.lakegeorgewaterkeeper.org

October 15, 2008

Mr. Robert Mastrantoni, Chairman
Village of Lake George Planning Board
Old Post Road
Lake George, NY 12845

Re: Holly Raj, Inc. (251.18-3-71)
Site Plan Review

Dear Mr. Mastrantoni:

The Lake George Waterkeeper has reviewed the submission for the above referenced site plan application. We understand the project proposal is the redevelopment of an existing site which is almost completely impervious. However, the Lake George Waterkeeper believes there is an opportunity for water quality improvements to be incorporated into this design. We offer the following for consideration by the Board:

STORMWATER MANAGEMENT

- 1. The project does not appear to comply with §220-59 regarding major stormwater management projects.** This section states “At a minimum, the control measures shall include those reasonable and necessary to infiltrate the runoff from the first ½” of precipitation from any storm event for all areas within the site which have been previously developed.” Has this been incorporated and if so, these values should be added to the stormwater management calculations.
- 2. The Lake George Waterkeeper would recommend the proposed landscape areas have stormwater treatment incorporated to improve water quality.** The entire miniature golf patio is proposed to be removed and have the grades lowered. This would allow the drainage to be routed into the proposed landscaped areas which could be used for bioretention reducing post-development runoff rates and improving water quality. The overflow from these landscaped areas can be connected to the proposed stormwater system.
- 3. Water quality structures should be incorporated.**
The plan proposes to install catch basins without any sediment removal or sumps incorporated or the addition of hoods to capture trash. The applicant should be required to modify the details. The plan also proposes to install a drain from the proposed refuse storage area (trash room). This drain first drains to the drywells which could be impacted by



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trash, grease or other pollutants. This should be reconsidered. The Waterkeeper feels these measures are necessary because it is believed the existing 60" pipe which the project will connect to conveys Prospect Mountain Brook through this area directly to Lake George.

- 4. The Planning Board should have the plan reviewed by an engineering consultant prior to approval.** There are aspects of the plan which the Board should rely on an engineering consultant for review which include the proposed volume for stormwater storage and infiltration rates.

GENERAL

- 1. It should be determined if the existing wastewater treatment facility has capacity for the proposed increase in wastewater flows from the project.** The Environmental Assessment Form claims the water usage will be 6000 gallons per day. What value was that based on and does it include the approximate 300 additional seats. At the peak of the tourist season, the Village of Lake George Wastewater Treatment Facility exceeds its design flow capacity. In addition, the facility currently has problems handling the average daily flows through the sand beds. This is resulting in high nitrate levels in West Brook located downstream from the facility which impacts water quality. It should be determined if the addition of approximately 300 seats will impact the wastewater treatment facility.

Thank you for your consideration of these comments and we look forward to working with the Village of Lake George Planning Board in defending the natural resources of Lake George and its watershed.

Sincerely,

A handwritten signature in black ink that reads "Chris Navitsky". The signature is written in a cursive, somewhat stylized font.

Christopher Navitsky, PE
Lake George Waterkeeper

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