



LAKE • GEORGE
WATERKEEPER®

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February 25, 2009

Mr. Chris Hunsinger, Chairman
Town of Queensbury Planning Board
742 Bay Road
Queensbury, NY 12804

**Re: Redbud Development – 31 Knox Rd (239.7-1-7)
Site Plan 14-2007 Modification**

Dear Mr. Hunsinger,

The Lake George Waterkeeper has reviewed the submission material regarding the above referenced site plan application modification. In general, this office views the proposed modified application will result in more impacts from the development than the original approved plan, which we felt was deficient. The Lake George Waterkeeper offers the following comments regarding the proposal:

1. The claim of the existing stormwater management facilities (“stone trenches”) should be verified.

The application material and justification for the expansion of the site relies significantly on the existing perimeter stone trench for roof runoff, which claims to adequately address stormwater runoff currently on the site as detailed in the Engineering Report for Stormwater Management System. Based on calculations, this trench should be 2 ft wide by 3 ft deep to provide adequate volume to meet the Town of Queensbury Stormwater Ordinance. Additionally, it should be verified if there is a footing drain present along the house underneath the stone trenches which would eliminate any benefit from infiltration into the “stone trench” by discharging the infiltrated runoff.

2. The only stormwater management controls proposed for the project appear to have been removed.

The proposed rain garden has been removed to eliminate a potential variance condition, regardless of the stormwater management benefits from the shoreline vegetation that were stressed during the initial review. In addition, it appears the depressed area off the driveway has been removed. It is troubling that all proposed stormwater management controls have been eliminated on this redevelopment project located within a Critical Environmental Area.



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3. The proposed development adds a deck and patio extension to the house.

The existing site includes a house over the lake, a large dock complex and a large house with a deck overlooking the lake. The proposed development will add a deck extension from the house. The entire width of the site will be developed at the expense of open space critical for buffering and protecting Lake George. The Queensbury Planning Board should be restrict increases in development within the shoreline setback and preserve the natural soils and vegetation to the greatest extent possible.

4. The existing on-site wastewater treatment system (OWTS) should be certified as compliant with applicable codes.

The existing OWTS appears to be constructed within the 100-foot separation distance to Lake George, does not incorporate a 50% reserve area and may lack adequate separation to boundary conditions, i.e. seasonal high groundwater. In addition, **§136-12 Pre-existing systems – Continuation** requires that an existing individual sewage disposal system conforms to Part 1 of Section 136 if it is used in connection with an existing structure in a WR-1A Waterfront Residential Zoning District when the floor area of the structure is increased.

It is our opinion the potential impacts to the lake outweigh the benefits to the applicant. Thank you for your consideration. We look forward to working with the Town of Queensbury 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, slightly slanted style.

Christopher Navitsky, PE
Lake George Waterkeeper

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