



LAKE • GEORGE
WATERKEEPER®

PO Box 591, Lake George, NY 12845

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

Email: info@lakegeorgewaterkeeper.org

www.lakegeorgewaterkeeper.org

September 21, 2009

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

Re: Provident Batavia, LLC – 67 Knox Rd. (239.7-1-14)
Site Plan 53-2007

Dear Mr. Hunsinger:

The Lake George Waterkeeper has reviewed the submission for the above referenced site plan application. It is our opinion the application contains many inconsistencies regarding design information. In addition, with the entire disturbance which has occurred on the site - it has been clear cut and striped prior to obtaining any permits – it is difficult to determine actual pre-development conditions. In light of these difficulties, the Lake George Waterkeeper would like to offer the following comments for the consideration by the Board:

STORMWATER MANAGEMENT

1. There is inconsistent information within the application materials.

- The drawings state the total impervious surface area is 4129 sf and calculations in the Stormwater Control Report state the total impervious cover is 4000 sf.
- The August 14, 2009 letter to the Town states “The predevelopment condition was conservatively estimated assuming a cover type for the entire parcel of a wood/grass combination (Runoff Curve Number 65) and did not include any impervious surfaces associated with the pre-development structures/improvements on the property.” The Pre-Development calculations incorporate a total impervious surface area of 3657 sf which does not reflect a conservative approach.
- Page 9 of the Stormwater Control Report states “Existing vegetation will be preserved as much as possible”. It is not sure how this can be accomplished since the site has been clear cut.

2. The actual infiltration rate used should be discussed and verified.

The infiltration rate used is stated as 10 inches/hour in the cover letter, 9 inches/hour in the Stormwater Control Report and 8 inches/hour in the calculations. However, an infiltration rate of 0.05 cfs used in the calculations is based on a rate of approximately 15 inches/hour. This should be clarified. In addition, the infiltration rate should be much less to reflect actual conditions during a 10-year (3.8 inches of rain) and 25-year (4.5 inches of rain) storm events.

3. The storage volume for the stone pipe bedding is inaccurate.

The calculations in the Stormwater Control Report state the volume of the 10' x 15' x 5' stone bed is 1104cf when it calculates to 750 cf.

4. The differences between pre- and post-development conditions are not accurately indicated by the Runoff Curve Numbers utilized.



THE FUND for LAKE GEORGE

Pre-development conditions consisted of mature white pines which approached 60 feet or more in height. Post development conditions consist of a site which has been clear cut, compacted soil disturbed by construction equipment and has short rooted turf installed. These calculations should be reevaluated.

ON-SITE WASTEWATER TREATMENT

1. The existing natural slope exceeds allowable for absorption beds and fill systems.

The existing grade where the on-site wastewater treatment system is proposed is 30% which exceed the allowable slope of 8% for absorption beds (New York State Department of Health Appendix 75A §75-A.8.g.2.ii) and 15% for raised systems (NYSDOH Appendix 75-A §75-A.9.b.2.iii). The Town of Queensbury Sanitary Code states the maximum allowable existing natural ground surface slope for built-up systems shall be 10% (§136-10.B.2) and no sewage disposal fill or mound system may be located within 200 feet of the shorelines of Lake George (§136.9.B).

2. Different percolation rates are used for the two separate designs.

Design Alternative SA1 used a percolation rate of 4.5 minutes/inch and Design Alternative SA1B used a percolation rate of 3 minutes/inch. However, the absorption fields are located in the exact same location. The percolation rates used should be verified. No leaching facility will be permitted within 200 feet of the mean high-water mark of a lake if the percolation rate is zero to three minutes per inch (§136-9.C).

It is apparent additional information should be provided to clarify the full scope and impacts of this application. This additional information should also include additional measures to protect the water quality of Lake George. There is much more that can be done to improve this project.

Thank you for your consideration of these comments and the Lake George Waterkeeper look forward to continuing to work with the Town of Queensbury Planning Board in defending the natural resources of Lake George and its watershed.

Sincerely,



Christopher Navitsky
Lake George Waterkeeper

cc: Michael White – Lake George Park Commission