



**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

February 22, 2010

Ms. Molly Gallagher
Lake George Park Commission
P.O. Box 747
Lake George, NY 12845

**Re: Banarsee – Ticonderoga (T) (150.67-4-21.111)
LGPC Application 1548-20-08**

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 regarding infiltration requirements. 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 applicant has proposed a series of biofiltration units with underdrains discharging to a larger diameter collection pipe discharging from the site. The design changes the natural drainage patterns of the area. The Lake George Waterkeeper recommends maximizing treatment through maintaining existing drainage patterns, encouraging infiltration and maximizing contact time with soils and filtration media.

- 1. The biofiltration units on the individual lots should encourage infiltration into existing soils that would reduce site runoff and increase treatment.** Infiltration is possible in the native clay soils, especially in the upper foot where the soils have higher porosity. The biofiltration units provide the required storage volume in the upper foot of the native site soils, but the incorporation of the underdrain eliminates the potential for infiltration. The underdrain outlet should be revised or eliminated to encourage treatment utilizing the existing soils.
- 2. The existing farm meadow should remain undisturbed to the maximize extent practicable to reduce runoff and encourage natural treatment.** Development should be discouraged from occurring in the natural drainage area in the center of the site to the greatest extent practicable. This would require the relocation of the proposed development on Lot 1 and possibly other items. Designating an undisturbed area for stormwater management and treatment on the site similar to the concept of the Handley subdivision is



THE FUND for LAKE GEORGE

encouraged and would allow the natural soils, topography and vegetation to absorb runoff and reduce volumes.

MAINTAIN EXISTING DRAINAGE PATTERNS

The concept of routing site runoff through biofiltration is encouraging. However, the project proposes the installation of a large collection pipe to discharge filtered runoff to a point northeast of the site and discharge into a separate subwatershed, which may reduce achieved benefits as well as significantly increase project costs. The Lake George Waterkeeper recommends maintaining existing drainage patterns and assessing options for crossing the existing drive while maintaining the concept of biofiltration.

The Lake George Waterkeeper recommends the following: 1) eliminating or adjusting the underdrain outlet to increase treatment through the existing soils; 2) designate an undisturbed area of the existing farm meadow to remain as part of the stormwater management system; and 3) evaluate the maintaining the existing drainage pattern and eliminate the large diameter discharge pipe.

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