



**LAKE • GEORGE  
WATERKEEPER®**

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December 10, 2008

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

Re: Eliopoulos Subdivision (14.8-1-1)

Dear Mr. Seerup:

The Lake George Waterkeeper has reviewed the application material for the above referenced subdivision. The subdivision proposes six lots on Skerrey Point which will require significant disturbance and clearing in a critical environmental area. In addition, there are numerous technical deficiencies with the proposal. The Lake George Waterkeeper would like to offer the following comments regarding the application:

**1. The project contains no information regarding stormwater management.**

The project is classified as a major stormwater plan as per the Lake George Park Commission Stormwater Regulations, which will require stormwater management for all proposed disturbed areas, not just impervious coverage. In addition, runoff from the existing developed areas of the project such as the road to the point and carriage house, would need to be managed. The stormwater management devices will require separation from wells and subsurface wastewater treatment systems. With the amount of development proposed, there could be constraints in meeting the sizing and separation requirements to adequately address stormwater management and treatment.

**2. There are portions of the on-site-site wastewater treatment systems do not meet New York State Department of Health Regulations.**

- It appears several of the OWTS will require fill to provide the proper separation to groundwater and/or bedrock such as Lot 2 and Lot 3. This grading information should be added to the design to determine proper setbacks. Many municipalities around Lake George require a 200 foot setback to the Lake George.
- The maximum natural existing grades for raised systems is 12%. Lot 2 will require a raised systems and the existing grade is 17%.
- An absorption bed is proposed for Lot 1 on Lot 7. The maximum allowable existing grade for an absorption bed is 8%. The existing grade at the proposed site is 24%.

**3. The proposed well locations do not provide adequate separation from upgradient OWTSs.**

NYSDOH regulations require when OWTS are located upgrade and in the general path of drainage to a well, the closest part of the treatment system shall be at least 200 feet away from the well. The well on Lot 2 is 95' downgradient of the OWTS on Lot 3. The well for Lot 4 is 140' from the OWTS on Lot 2 and 115' from the OWTS on Lot 4.



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4. **The OWTS for Lot 6 should be inspected and certified. In addition, the water source for the lot should be identified.**

5. **Insufficient information is provided to determine if the lots are buildable.**

- There are not driveways indicated for any of the lots which are needed for stormwater management calculations and design. In addition, the grades may be excessive for driveways requiring significant earthwork. For example, the road access provided for Lot 3 has grades of 30%.
- The well for Lot 3 is proposed on a cliff. This location should be reevaluated.
- Is there a setback to structures from a right-of-way?
- The proposed parking area on Lot 5 is proposed on 20% grades along a stream.

6. **An undisturbed buffer should be provided along the stream corridor for water quality protection.**

The project proposes significant disturbance adjacent to the existing stream removing all protective buffer. In addition, it appears the stream may need to be filled in for the proposed parking on Lot 5. The removal of the protective buffer and construction of driveways and parking areas adjacent to the stream will have water quality impacts through the discharge of pollutants and sediments. Gull Bay was recently dredged to remove accumulated sediment from disturbance and stormwater runoff.

7. **Several large “U” shaped docks were approved by the Lake George Park Commission in 2003 for areas of property which are not referenced in the proposal.**

The applicant should discuss these approved dock permits and whether there is intention to construct them. The Planning Board should require the applicant to contact the Lake George Park Commission to determine if the permits for the docks would be null and void with the subdivision approval.

The Lake George Waterkeeper has numerous concerns regarding the proposed application but the greatest concern is the amount of disturbance and clearing proposed to accommodate the maximization of development on a sensitive lakefront parcel. Please find attached several photographs of an algae bloom in Gull Bay from the summer of 2008. To prevent further episodes, it is imperative for the Town of Putnam Planning Board to review the entirety of the proposal, including stormwater which can have the largest impact to the water quality of Lake George. It is our opinion the application should be denied as submitted or at a minimum, determined to be incomplete and tabled.

Thank you for your consideration. The Lake George Waterkeeper looks forward to working with the Town of Putnam Planning Board in defending the natural resources of Lake George and its watershed.

Sincerely,



Christopher Navitsky, PE  
Lake George Waterkeeper

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