



**LAKE • GEORGE  
WATERKEEPER®**

PO Box 591, Lake George, NY 12845

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

email: [mfo@lakegeorgewaterkeeper.org](mailto:mfo@lakegeorgewaterkeeper.org)

[www.lakegeorgewaterkeeper.org](http://www.lakegeorgewaterkeeper.org)

December 2, 2008

Mr. Keith Hanchett, Chairman  
**Town of Lake George Planning Board**  
Old Post Road  
Lake George, NY 12845

Re: BBD of Albany, LLC (264.12-1-27)  
Major Subdivision #8-2008

Dear Mr. Hanchett:

The Lake George Waterkeeper has reviewed the application material for the above referenced subdivision for mixed residential use. Although the concept has been revised since the previous single family subdivision layout, many of the same impacts that this Planning Board determined required an Environmental Impact Statement still remain – stormwater runoff, disturbance to steep slopes, clearing, potential for erosive conditions and lack of sanitary sewer treatment. The Lake George Waterkeeper would like to offer the following comment regarding the application:

**STORMWATER MANAGEMENT**

**1. Insufficient information has been provided for the deep test pits to determine the adequacy for infiltration.**

§175-21.G.2.b.3 requires subsurface soil investigations to extend two below the base of the proposed infiltration devices. The chambers in Basin A.1 are proposed to be 8' below existing grade and Test Boring B-8 was at a depth of 6.5 feet with moist conditions. The chambers for Basin A.2 are proposed 8' below existing grade and Test Boring B-7 was at a depth of 5.6 feet with moist conditions. The chambers in Basin A.5 are proposed to be 9 feet below existing grade and Test Boring B-5 was at a depth of 7.5 feet, with moist conditions. There was no test boring at the location of Basin A.3. More information should be provided to determine if these systems can function properly including percolation tests at the depths proposed.

**2. There is no information or details regarding the proposed infiltration basins and chambers.**

These facilities indicate a proposed standpipe to convey runoff to the infiltration chambers which is not indicated. Also, there does not appear to be means for the removal of sediment to protect the infiltration facilities as required in §175-21.G.2.b.9.



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**3. The Stormwater Management Report does not contain determinations for pre- and post-development runoff calculations.**

There is no information regarding the Runoff Coefficients, associated areas and/or land covers which are used to determine runoff values. This information should be provided.

**4. There are several hundred feet of proposed road where no stormwater management will be provided. Is the intent of the applicant to have this runoff flow onto Bloody Pond Road without any stormwater management?**

**5. Bloody Pond Road currently experiences washouts from developments and access roads on the eastern uplands of French Mountain and this condition should be improved.**

Has Warren County Department of Public Works approved the proposed project? This should be required prior to any final approvals.

**GENERAL**

**1. There are no sewage connections available for the proposed 25 units proposed.**

The Town of Lake George was allocated a total of 49 connections to the Village of Lake George Wastewater Treatment Plant in 2005. As of December 2007, the Planning Board has allocated a total of 51 connections. The applicant should be required to provide a letter from the Village granting approval for the proposed connections.

**2. The proposed erosion and sedimentation control plan seems inadequate regarding the proposed disturbance on the steep slopes.**

**3. It should be determined if the applicant has the right to reconstruct Dyer Road off the immediate property.**

**4. The applicant should consider the reduction of impervious coverage through the combination of driveways.**

The driveway for Units #20-24 could be eliminated and designed as a shared driveway with Units #6-15. This would result in a reduction in clearing and grading on steep slopes and reduction of material cost through the elimination of pavement and infrastructure cost (piping, manholes and stormwater management).

The Lake George Waterkeeper remains concerned with the level of proposed development on steep slopes and the associated clearing and grading. Although there has been improvement in the stormwater management design, additional information, investigation and detail is needed to determine if treatment is adequate. Finally, it is inconceivable this application could be furthered without any means to address wastewater treatment. Therefore, we request the Planning Board deem this application incomplete until these important items are addressed.

Thank you for your consideration. The Lake George Waterkeeper looks forward to working with the Town of Lake George 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  
Michael White – Lake George Park Commission