



LAKE • GEORGE
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December 14, 2009

Mr. James Underwood, Chairman
Town of Queensbury Zoning Board of Appeals
742 Bay Road
Queensbury, NY 12845

Re: Koleci – 315 Cleverdale Rd. (226.12-1-29)
Area Variance 68-2009

Dear Mr. Underwood:

The above referenced appeal was personally reviewed in my capacity as a licensed professional engineer and the Lake George Waterkeeper. The Lake George Waterkeeper would like to offer the following comments for consideration by the Board:

FLOOR AREA RATIO

The Floor Area Ratio is a planning tool to provide adequate area to accommodate requirements (infrastructure) necessary to support development and to prevent exceeding the capacity of a site. If the Zoning Board of Appeals grants variances to this section, additional mitigation should be provide to compensate for the increased pressures, such as stormwater management and vegetative planting. The Lake George Waterkeeper recommends the applicant be required to install stormwater management for the project, preferably through a rain garden.

ON-SITE WASTEWATER TREATMENT SYSTEM (OWTS)

The Lake George Waterkeeper supports the proposed construction of a new OWTS, which consists of an absorption bed with Eljen In-line Drains. However, several aspects of the design are not compliant with applicable codes and should be considered for a complete site design:

- 1. For design purposes, all rooms that could become bedrooms in the future (dens, expandable attics, sleeping porches, etc.) must be considered as a bedroom.** The OWTS is designed for a 2 bedroom residence but the floor plans indicate a den. The Lake George Waterkeeper recommends the system be designed as a 3 bedroom residence.
- 2. Design calculations based on applicable absorption areas should be provided.** The New York State Department of Health considers the use of Eljen In-line Drains as advanced treatment when applied in absorption trenches and allow an increased design application rate. However, the increased design application rate is not permitted for absorption beds due to the reduction in side wall surface area available for treatment.

The Lake George Waterkeeper recommends design calculations be submitted for the proposed OWTS absorption field design.

- 3. Absorption beds require pressure distribution for adequate treatment.** New York State Department of Health requires pressure distribution for absorption beds for increased distribution of effluent due to the reduced sidewall area available for treatment.

The Lake George Waterkeeper looks forward to working with the Town of Queensbury Zoning Board of Appeals to defend the natural resources of Lake George and its watershed. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Chris Navitsky". The signature is written in a cursive, flowing style.

Christopher Navitsky
Lake George Waterkeeper

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