



**LAKE • GEORGE
WATERKEEPER®**

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April 22, 2008

Mr. Chris Hunsinger, Chairman
Town of Queensbury Planning Board
742 Bay Road
Queensbury, NY 12804

Re: Redbud Development – 31 Knox Rd (239.7-1-7)
Site Plan 14-2007

Dear Mr. Hunsinger:

We have reviewed the submission material regarding the above referenced site plan application. We recognize the fact the applicant has proposed increasing types and numbers of native species (species and varying sizes) to the site plan. However, the Lake George Waterkeeper offers the following comments regarding the proposal:

1. **The proposed development increases impervious coverage within 100 feet of Lake George sacrificing lake shore areas which should be used for buffering.** The existing development contains a house over the lake, a large dock complex and a large house with a deck overlooking the lake. The proposed development proposes to add a blue stone patio on the shore as well as a deck extension from the house. The entire width of the site will be developed at the expense of open space critical for buffering and protecting Lake George. This Board should be restricting increases in development within the shoreline setback and preserving the natural soils and vegetation to the greatest extent possible.
2. **The construction of the proposed retaining wall will have adverse environmental impacts on Lake George.** In a February 1, 2008 correspondence regarding the proposed retaining wall replacement, Attorney Bitter states "... (the) replacement wall will be constructed behind the existing wall that will be above the mean high water line." Based on Detail 1 of the construction drawings, this indicates construction and excavation for the wall footings will extend below the mean high water mark (listed as 320.805) and the current water line (319.73) as well as be closer towards the lake. This will result in concrete being placed below the lake level of Lake George. How will the lake be protected? Currently, Lake George has calcium levels which are just below the threshold to support the development of adult zebra mussels. However, calcium leaching from concrete materials can create micro-environments conducive for the development of zebra mussels; there have been discoveries at various locations around Lake George, including the Cleverdale shoreline. In addition, the excavation for the footings for the wall will result in sediment impacts to the lake.
3. **The location of proposed raingardens behind the retaining wall could result in short-circuiting stormwater management practices.** 12" of stone are proposed behind the



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retaining wall to relieve pressure from water accumulating behind the wall. However, rain gardens are proposed to be constructed along the retaining walls for stormwater management above the 12" stone. Therefore, the infiltrated stormwater will be collected in the stone drain behind the wall and directly discharged through the "perforated tile pipe", resulting in limited quantity or quality treatment.

4. **The proposed access drive will produce higher levels of runoff and reduce infiltration due to compaction of soils.** A drive is proposed provide access for the construction of the retaining wall. Construction equipment such as concrete trucks, excavators and dump trucks will utilize the drive creating a need for stabilization. In addition, equipment activity will compact the existing soils greatly reducing infiltration rates. Equipment activity eliminates soils pores 6 to 8 inches below the surface and could extend as deep as 3 feet depending on the soil type and axle load. Therefore, runoff calculations should reflect these conditions which will further increase runoff and reduce effective vegetative areas for infiltration.
5. **Additional information should be provided regarding the retaining wall to determine if it can be constructed as shown.** The details indicate the drain behind the wall will be placed below the lake level preventing hydrostatic relief behind the wall. This simply will not work and should be reviewed.
6. **The existing septic system will not be compliant with the construction of the proposed garage.** Absorption fields require a 20 foot separation from buildings and it appears the proposed garage location may not compliant. In addition, there is concern regarding protecting the existing field during construction and the required 50% reserve area for replacement.

It is our opinion the potential impacts to the lake outweigh the benefits to the applicant and request the Queensbury Planning Board to deny the application as presented.

Thank you for your consideration. I look forward to working with the Town of Queensbury Planning Board in defending the natural resources of Lake George and its basin.

Sincerely,

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

Christopher Navitsky, PE
Lake George Waterkeeper

cc: Brian Grisi – Adirondack Park Agency