



**LAKE • GEORGE**  
**WATERKEEPER®**

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February 25, 2010

Hon. Frank McCoy, Supervisor  
Town of Lake George Town Board  
Old Post Road  
Lake George, NY 12845

**Re: Proposed Six Month Sewer Moratorium  
Public Comments**

Dear Supervisor McCoy:

The Lake George Waterkeeper would like to thank the Lake George Town Board for the consideration of the above referenced moratorium and permitting the public comment.

Capacity issues in the Caldwell Sewer District and impacts from greater than design flows to the Village of Lake George Wastewater Treatment Plant are having impacts to the community and the environment. Our concerns have continually been expressed by this office over the past five years and have not only been addressed to the Town of Lake George Board but also to the Village of Lake George and the New York State Department of Environmental Conservation.

The reason for the moratorium should be properly addressed. The problem causing the need for the moratorium should not be resolved by increasing capacity at the plant, but through the repair of the existing infrastructure, such as leaking and cracking sewer pipes, and illegal connections. The failure to address these problems has resulted in impacts to the water quality of Lake George, including the devastating failure at the Shepard Park pump station.

The Lake George Waterkeeper offers the following in support of the moratorium:

**THE MORATORIUM SHOULD BE IMPLEMENTED TO CORRECT THE EXTENSIVE INFLOW/INFILTRATION PROBLEM IN THE CALDWELL SEWER DISTRICT**

The capacity problem at the wastewater treatment plant is a result of a failure to address maintenance needs of the collection system. The inflow and infiltration (I & I) problem is well known and documented, but ignored by previous leadership. An August 2007 study prepared by C.T. Male for the Village of Lake George analyzed the flows at the treatment plant during the non-tourist season to minimize seasonal impacts. The report concluded from back-to-back storm events of 1.0-1.5 inches of rain within a three day period, flows at the plant nearly doubled over a five day period and did not normalize for several additional days. The report states "During the peak flow the contribution from the Town increased by nearly 100% and the Village



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portion increased by at least 80%, indicating serious I & I problems in both the Village and Caldwell district collection systems.”

**THE MORATORIUM SHOULD BE IMPLEMENTED TO CORRECT WATER QUALITY IMPACTS TO LAKE GEORGE FROM THE OVERCAPACITATED COLLECTION SYSTEMS**

The effluent from the Lake George Treatment Plant is having direct impacts to the water quality of Lake George as documented through studies by the Darrin Fresh Water Institute. In a March 2008 Draft Interim Report on the West Brook Stormwater Project, it was reported:

“Nitrate and total nitrogen levels are substantially higher in West Brook than in most streams entering Lake George, and exceed lake levels by a factor of a hundred. This large discrepancy has been attributed to the proximity of the infiltration beds at the Lake George Village Sewage Treatment Plant, whose subsurface discharge impacts the results ...”

Therefore, maintaining the existing influent flows and providing additional capacity will not improve the water quality of the Lake George Treatment Plant effluent and corresponding impacts to Lake George. The reduction of the hydraulic loading to the treatment plant would increase treatment efficiency, improving effluent quality and reduce the impacts to Lake George.

**THE MORATORIUM SHOULD BE IMPLEMENTED TO REDUCE RATES TO DISTRICT USERS FOR TREATING CLEAN WATER**

It has been stated this moratorium would impact property owners within the Caldwell Sewer District who have paid taxes and have the right to connect to the system. However, the rights of the current property owners should also be respected who are currently being made to pay for the treatment of clean water entering a leaking and failing infrastructure. The Town of Lake George Town Board has the responsibility to protect its taxpayers from excessive and unnecessary charges such as the treating clean water.

**THE TOWN HAS ACCESS TO THE TOOLS TO INVESTIGATE THE CAUSES OF EXCESS FLOWS**

All municipal sewer districts within the Lake George watershed have the availability of a camera that is capable to assess and investigate excess flows entering a collection system. This was made possible through the Lake George Watershed Conference. It is in the Town’s best interest to take advantage of this equipment and the offer of the Lake George Village personnel to assist the Town.

Now is the time for the Town of Lake George to step up, represent the best interests of its residents, protect the jewel that supports the Town and region and enact the proposed moratorium. But, most importantly, the moratorium should be for as long as it takes to adequately address the problem of excess flows, not to simply construct additional capacity at the treatment plant and ignore the source of the problem. Any investment and grant writing should be directed towards the inflow and infiltration problems overwhelming the Caldwell Sewer District, impacting the Lake George Wastewater Treatment Plant and ultimately the water quality of Lake George.

Thank you for your consideration.

Sincerely,



Christopher Navitsky, PE  
Lake George Waterkeeper

cc: Town of Lake George Town Board members  
Hon. Robert Blais – Village of Lake George Mayor