



LAKE • GEORGE
WATERKEEPER®

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June 13, 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:

The Lake George Waterkeeper has reviewed the submission material regarding the above referenced site plan application. This Board has deliberated over this application for several meetings and through your involvement and public comment; there has been improvement to the proposal to mitigate the potential impacts to Lake George. It is also recognized that the applicant is willing to increase planting on the property. 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.

Although the applicant continues to focus on the reduction of overall impervious coverage on the property, there is a net increase in impervious coverage within 100 feet of the lake, which is an area which should be preserved for shoreline protection. The entire width of the site will be developed at the expense of open space critical for buffering and protecting Lake George. It is our opinion the Board should continue their protection and scrutiny of development in close proximity to Lake George.

2. The construction of the proposed retaining wall will have adverse environmental impacts on Lake George.

The decision by the New York State Department of Environmental Conservation to permit the construction of a concrete retaining wall in Lake George remains perplexing. This is a change from their policy of discouraging vertical shorelines which has impacts on the ecological integrity of the lake and disrupts the transition between the lake and land. The applicant still has not provided information regarding how the waters of Lake George will be protected from concrete. Our concerns regarding the leaching of calcium remain and the potential for developing a microenvironment conducive to the development of zebra mussels is possible. In addition, it is unclear of the necessity of the replacement of the retaining wall.



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Upon review of the photographs dated May 14, 2008 in the submission, it appears the bottom portion of the wall is dry laid and in fairly stable condition and not near failure. It is the policy of the Lake George Waterkeeper to recommend natural shoreline stabilization in lieu of constructed retaining walls.

3. **It appears there will be construction/demolition above the existing absorption field.** It appears there will be the removal of a retaining wall and blue stone patio above the existing absorption field which may impact the condition of the system. The extent of the disturbance should be provided. Furthermore, there should be some consideration for the 50% reserve / replacement area for the system.

Upon review of the application, once the benefits to the applicant are weighed against potential environmental impacts, it is the opinion of the Lake George Waterkeeper that the existing proposal has a great potential to impact Lake George. For example, all the proposed revegetation can do nothing to mitigate the impacts to the lake from pouring concrete footings below the water elevation.

Thank you for your consideration. The Lake George Waterkeeper looks forward to working with the Town of Queensbury 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