



LAKE • GEORGE
WATERKEEPER®

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June 2, 2008

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

Re: Bolen/Coons (225.08-1-58.2)
SP #19-2008

Dear Mr. Hanchett:

The Lake George Waterkeeper has reviewed the submission for the above referenced site plan. It should be stated for the record that the Town of Lake George Planning and Zoning Boards have failed to adequately provide a comprehensive review of the above referenced parcel and associated subdivision. Decisions have been made without topographic information necessary to determine the ability of the parcels to accommodate the necessary infrastructure to support residential development and mitigate impacts from such development. We would like to offer the following comments regarding the application:

- 1. The on-site wastewater treatment (OWTS) appears to require a variance.** The maximum allowable existing natural ground slope for a fill system is 10% (per *LG CBOH A180-9, 18a*). The land on this property designated for the absorption field has a slope over the maximum required 10%.
- 2. A variance for the required 100 ft road frontage / lot width in *RCH-LS* is required.**
- 3. A major stormwater plan should be required.** On a parcel with slopes in excess of 23% (as stated on the May 16, 2008 application), appropriate stormwater management should be required. The proposed grass swales on the site map should be replaced with more substantial vegetation, creating a bioretention area, with root depths and amended soils that are more capable of infiltrating runoff and treating nutrients and pollution.
- 4. The proposed stone infiltration trench may be inadequate for stormwater management.** Infiltration devices need to be installed on slopes not greater than 5% to provide infiltration. In addition, there is a tendency in the Lake George watershed for these devices to only function for a couple of years until they become too clogged and require a high level of maintenance. Furthermore, the removal of mature vegetation will reduce the ability for infiltration.



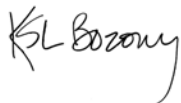
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In light of what has been approved for the steep slopes on the adjacent parcel to the north (with a necessary cut and fill serpentine driveway up the hillside and no stormwater management maintenance plan to be monitored), the cumulative environmental impact for development on this property is great. Careful consideration should be made for site plan approvals of this recently approved non-conforming subdivision.

To reiterate, the issues identified above should have been addressed by the TLG ZBA and PB before the non-conforming subdivision was approved. The approval was granted by both boards with no discussions of the steep slope, septic location or potential harm to the environment from this proposed development (refer to 12/20/07 ZBA and 2/19/08 PB meeting minutes). The ZBA also failed to conduct the scheduled public hearing in December 2007. Therefore, we request the Board to schedule a public hearing on this application.

Thank you for discussing possible mitigations to improve the impact of construction on this hillside. 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,

A handwritten signature in black ink, appearing to read "KL Bozony". The signature is written in a cursive, somewhat stylized font.

Kathleen SL Bozony
Natural Resource Specialist / Lake George Waterkeeper

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