



**LAKE • GEORGE**  
**WATERKEEPER®**

PO Box 591, Lake George, NY 12845

Tel: (518) 668-5913 Fax: (518)-668-5915

Email: [info@lakegeorgewaterkeeper.org](mailto:info@lakegeorgewaterkeeper.org)

[www.lakegeorgewaterkeeper.org](http://www.lakegeorgewaterkeeper.org)

April 2, 2010

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

**Re: Abrantes (264.03-1-38, 39, 40 & 41)**  
**Site Plan Review 5-2010**

Dear Mr. Hanchett:

The above referenced application was personally reviewed in my capacity as a licensed professional engineer and the Lake George Waterkeeper. The Lake George Waterkeeper requests that the Planning Board apply the Town's regulations for site plan review during your deliberations regarding the above referenced application and offers the following:

**APPLICATION FAILS TO ADDRESS EXISTING STORMWATER DRAINAGE**

The project is part of Prospect Mountain Estates that has existing stormwater drainage patterns, which will be altered by the significant grading to accommodate the site development. In addition, the proposed stormwater management facilities may be impacted by the existing drainage and this has not been considered in the design.

- 1. Off site runoff from Avenue B will be routed through the proposed stormwater management area (SMA#1) which is not adequately sized to handle the additional runoff.** Currently, runoff from Avenue B flows north onto the referenced property, where it is managed in an existing forested depressed area. The project proposes to fill this depressed area, rerouting the runoff towards the proposed stormwater management area. According to the Stormwater Control Report, this off site runoff is not considered and will increase total runoff to the proposed stormwater management area, which will impact the facility ability to function.
- 2. Existing drainage discharge from Kings Road appears to be covered by the proposed grading plan.** There are catch basins and stormwater piping which discharge approximately 10 feet east of the proposed driveway. The outlet of this pipe will be covered by the extensive grading required for the site development. Any proposed design should account for the potential erosion from the discharge onto the steep slopes which are going to be created from the project.



THE FUND for LAKE GEORGE

**STORMWATER PLAN FAILS TO DETERMINE IF SUITABLE SOILS ARE PRESENT**

Stormwater Management Area #1 is proposed in a 12 foot cut with a dry well and stone extending an additional 6 feet deep. Infiltration rates are significantly reduced at deeper depths and soil components necessary for treatment are lacking in deeper subsoils. Subsurface soil investigations should be provided to determine if the soils are adequate.

**POTENTIAL IMPACTS TO THE WEST BROOK ESTATES SHOULD BE EVALUATED**

The project will discharge uncollected stormwater from the site development onto lots of the West Brook Estates subdivision. In addition, the previous mentioned runoff from Kings Road will be directed towards the subdivision as well as possible impacts from the unaccounted runoff from Avenue B. These could have an impact on the proposed on-site wastewater treatment and stormwater management systems in the West Brook Estates lots.

**ON-SITE WASTERWATER TREATMENT SYSTEM (OWTS)**

The OWTS is proposed on 6 feet of fill. New York State Department of Health regulations prohibit the installation of fill systems on natural slopes exceeding 15%. This system should be redesigned or needs to obtain a waiver from the New York State Department of Health.

In general, these lots were previously reviewed in 2006 for development and the Planning Board expressed concerns about the grades and runoff from the site. Although the level of development has been reduced to a single family home, the disturbance and grading required developing the site remains extensive, creating 33% grades with minimal buffer to the adjacent subdivision.

The Lake George Waterkeeper recommends the following: 1) The stormwater management plan should address existing off site runoff from the roads of Prospect Mountain Estates that drain onto and through the site; 2) Determine if the soils for the stormwater management facilities are acceptable at the depth proposed; 3) Evaluate the potential impacts to the West Brook Estates lots from the proposed development; and 4) Provide an OWTS compliant with New York State Department of Health regulation.

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

Sincerely,



Christopher Navitsky, PE  
Lake George Waterkeeper

cc: Michael White – Lake George Park Commission