



**LAKE • GEORGE**  
**WATERKEEPER®**

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November 19, 2009

Mr. Herb Koster, Chairman  
**Town of Bolton Planning Board**  
4949 Lake Shore Drive  
Bolton Landing, NY 12814

Re: Bell Points Shores Homeowners Association (186. 18-1-31)  
SPR09-20

Dear Mr. Koster:

The above referenced site plan review application was personally reviewed in my capacity as a licensed professional engineer and the Lake George Waterkeeper. I would like to offer the following comment and related concerns to the Board for its consideration:

**Limiting Disturbance within Critical Environmental Area**

**Increased disturbance and impervious surfaces on steep slopes in close proximity to the lake increases stormwater runoff and pollutants resulting in negative impacts to Lake George.** The original subdivision was approved with limited disturbance to the waterfront common lot in order to reduce negative impacts. However, improvements have been made by the applicant that should be mitigated. The failure of the Bell Point Shores Homeowners Association to properly manage stormwater and maintain their stormwater system is well documented and has resulted in significant sedimentation problems. The Homeowners Associations should be required to install the proposed stormwater improvements specified in the Stormwater Management Plan Maintenance Agreement dated April 19, 1994. The Lake George Waterkeeper recommends that the Town of Bolton Planning Board deny the proposed waterfront parking area, revegetate the disturbed area and require the installation of the proposed stormwater management controls to address existing stormwater runoff and sedimentation problems.

The following conditions should be required by the Planning Board for the proposed stormwater control measures in order to improve water quality protection:

1. The applicant should install grass pavers which would stabilize the areas where traffic is concentrated reducing the potential for erosion and sedimentation;
2. The volume of the proposed stormwater controls should be increased to provide a minimum of 1.5 gallons of storage for square foot of impervious cover in close proximity to the lake;
3. Pretreatment sediment forebays should be installed prior to the stormwater infiltration basins to remove sediment and prevent clogging since sedimentation has been experienced in the area for years;



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4. Rain gardens should be installed which will provide a greater level of treatment through uptake of nutrient by the roots and adsorption by the amended soils; and
5. Erosion control measures should be required for the concentrated flows in swales on slopes of 30%.

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

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  
Michael White – Lake George Park Commission  
Ton Jarrett, PE – Jarrett Engineering, PLLC