



LAKE • GEORGE
WATERKEEPER®

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June 16, 2010

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

Re: Cantrell – Federal Hill Road (156.00-1-20.3)
SPR10-10

Dear Mr. Koster:

The above referenced subdivision application was personally reviewed in my capacity as a licensed professional engineer and the Lake George Waterkeeper. The Lake George Waterkeeper supports the application regarding the increased capacity planned for the on-site wastewater treatment system (OWTS) to a four bedroom design flow that will provide increased treatment. I request the Planning Board to apply the Town's regulations, specially the Stormwater Management Ordinance, during your deliberations regarding the above referenced application.

The application should require a major stormwater plan based on area of disturbance.

The proposed clearing appears to exceed the 15,000 sf threshold and should be considered a major stormwater project. However, the application is submitted as a minor stormwater project. At a minimum, clearing limits should be designated in field to verify clearing limits. Additionally, silt fence should not be considered as delineation because if installed as proposed, perpendicular to contours, this creates erosive conditions.

The proposed stormwater control measures should be converted to rain gardens with soil amendments and native vegetative plantings for increased stormwater treatment.

Soil amendments and native vegetative planting are the main components of rain gardens. Amended soils, consisting of top soil, compost and/or mulch, provides microbes and organic matter that absorb nutrients and increases the treatment of pollutants. These are recommended to improve water quality in areas with the rapid soil percolation rates that do not allow adequate contact time with soils for nutrient and pollutant removal.

Deep test pits should be required to verify the separation to groundwater for the proposed infiltration basins that are proposed to have 2' excavation.

The grass lined swale between the house and driveway appears to be located upgradient of the driveway.



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The Lake George Waterkeeper recommends the following: 1) Require a major stormwater plan; 2) Convert the proposed grass lined basins to rain gardens with the addition of amended soils and native plantings to increase stormwater treatment; 3) Require soil investigations to verify depth to groundwater for stormwater management components; and 4) Verify positive grading to all stormwater controls.

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, flowing style.

Christopher Navitsky, PE
Lake George Waterkeeper

cc: Michael White, Executive Director – Lake George Park Commission