



**LAKE • GEORGE
WATERKEEPER®**

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October 27, 2008

Mr. Chris Hunsinger, Chairman
Town of Queensbury Planning Board
742 Bay Road
Queensbury, NY 12845

Re: Garner Holdings, LLC – Forest Lane (226.19-1-37)
Site Plan 44-2008

Dear Mr. Hunsinger:

The Lake George Waterkeeper has reviewed the submission for the above referenced site plan application and would like to offer the following comments for the record:

ON-SITE WASTEWATER TREATMENT SYSTEM (OWTS)

1. It appears the application is incomplete and fails to list all variances required.

- New York State Department of Health Wastewater Treatment Standards Appendix 75-A Table 2 states "For all systems involving the placement of fill material, separation distances are measured from the toe of slope of the fill". A 10' separation is required between an absorption field and a property line and 20' between an absorption field and dwelling. The project proposes 5' of separation to the property line and 5' of separation to the dwelling from the toe of slope of the fill. In addition, it should be determined if the bonus room is considered as an extra room and therefore be considered in the wastewater calculations.

2. There is no deep test pit information provided to determine the usable soil above seasonal high groundwater.

§136-9.B states "natural ground intended for the leaching facility must have a minimum of three feet of usable soil above maximum high seasonal groundwater within 1,000 feet of the shoreline of Lake George." This information should be provided.

3. The proposed OWTS is installed on slopes exceeding the allowable for fill systems.

§136-10.B.2 states "The maximum allowable existing natural ground surface slope for built-up systems shall be 10%". The existing grade where the fill system is proposed is 14%.

STORMWATER MANAGEMENT

1. Deep test pit information should be provided for the stormwater management facility.

2' of separation is required between the base of an infiltration facility and seasonal high groundwater. This could be critical since the facility is located 60' from wetlands.

2. The project is located in a Critical Environmental Area and therefore, should the stormwater management project be considered as a major project?



THE FUND FOR LAKE GEORGE

Based on the information submitted, the Lake George Waterkeeper believes the current application poses too much disturbance resulting in adverse environmental impacts to the adjoining wetlands and water quality.

Thank you for your consideration of these comments and I look forward to working with the Town of Queensbury Planning Board in defending the natural resources of Lake George and its basin.

Sincerely,

A handwritten signature in black ink that reads "Chris Navitsky". The signature is written in a cursive style with a large, stylized initial "C".

Christopher Navitsky, PE
Lake George Waterkeeper

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