



Board of Directors

March 26, 2014

Charles Clusen
Chair

Ms. Colleen Parker
NYS Adirondack Park Agency
PO Box 99
Ray Brook, NY 12977

Lorraine Duvall
Dale Jeffers
Michael Wilson
Vice-Chairs

**RE: Public comments on the Lake George Marriot Hotel and Convention Center,
APA Project 2013-64**

Sidney Harring
Secretary

Dear Ms. Parker,

David Quinn
Treasurer

Protect the Adirondacks has a number of concerns about the proposed 120-room Lake George Marriott hotel and convention center on Canada Street in the Village of Lake George. As a 6-story building, the project will stand out mightily from any other structure around it. The high school next door is three stories at its highest point.

Nancy Bernstein
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Peter O'Shea
Kenneth Strike
Philip Terrie

PROTECT recently reviewed early submissions from the applicant and believes that additional information is needed. The Adirondack Park Agency (APA) should send the applicant a Notice of Incomplete Application that deals with the points and comments made below.

Peter Bauer
Executive Director

Capacity of Sewage Treatment Plant: There are many questions around the capacity of the Lake George municipal sewage treatment plant to handle the increased volumes from this facility. A recent study funded by the Department of State (DOS) looked at stream discharges to Lake George from around the lake. West Brook was found to be the biggest single source of nutrient loading to Lake George. West Brook loads at a significantly higher rate than other streams in the basin.

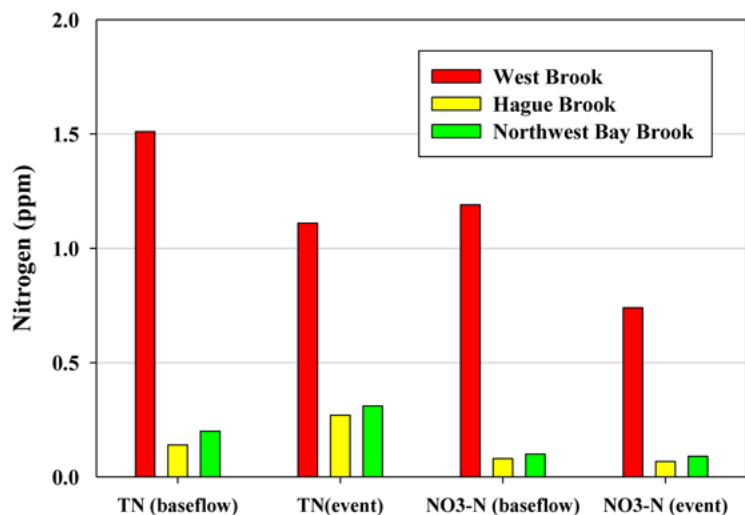
One thing that sets West Brook apart is that the sewage treatment plant leaches nutrients into it through the groundwater. West Brook is downslope from the sewage treatment plant, about 1/3 of a mile away. The study funded by the DOS (and the APA should make sure that they get this compete study) is based on multiple samples from West Brook at natural locations on the flanks of Prospect Mountain west of the Northway and then downstream in the Village before and after ground water leaching points from the sewage treatment plant.

Protect the Adirondacks

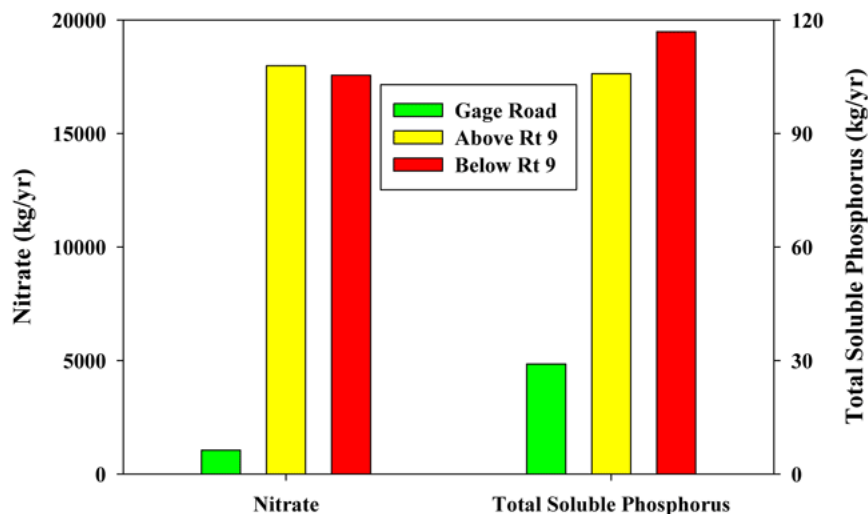
PO Box 769, Lake George, NY 12845 518.685.3088
www.protectadks.org info@protectadks.org

This study shows how urban impacts can change water quality. The water values from the natural stream flowing off of Prospect Mountain are beautiful, but then the impacts from the Northway, sewage treatment plant, Route 9, and Lake George Village's urbanized zone dramatically degrade water quality. The biggest single impact for nutrient loading is when West Brook absorbs leaching groundwater from the sewage treatment plant. See charts below for Total Nitrogen, which shows the stark difference in nitrogen loading in West Brook compared with other streams, and for Total Soluble Phosphorus, which features sample points above and below the sewage treatment plant:

Concentrations of Total Nitrogen and Nitrate, 2007-2010



Concentrations of Total Soluble Phosphorus, 2007-2010



Source: Darrin Fresh Water Institute/Lake George Watershed Coalition

The Total Nitrogen chart shows a major difference in water quality between West Brook and other major streams around Lake George. The charts above shows the significant difference in water quality in West Brook above and below the point where the sewage treatment plant leaches into West Brook through ground water. The difference in water quality upstream and downstream from the sewage plant is undeniable.

Attached, please find charts from an interim report from the RPI Darrin Fresh Water Institute made to the Lake George Watershed Coalition, a project of the Department of State, on its streams study. Note that West Brook loads far more nitrogen to Lake George than other streams when isolated for loading per acre. The source is the sewage treatment plant. High nutrient loading at the south end of Lake George is the principal cause for the formation of the annual “dead zone” hypoxic area that forms each summer-fall in Lake George.

The proposed Lake George Marriott has stated it will generate 17,000-28,000 gallons a day of wastewater to the sewage treatment plant. The plant’s capacity to handle this increased volume must be evaluated during the APA review.

Channelized and Enclosed Stream Runs Under/Near Property and May be Used for Stormwater

Discharges: The Marine Village resort property is across the street from the Lake George Marriott. It also owned by Mr. Kenny, the Lake George Marriott sponsor. An underground stream enters lake George on the Marine Village beach. This stream has been channelized and put in pipes underground as it runs through the Village, in the area of the Lake George Marriott site. This stream shows a constant flow and during storms runs black. It appears that various properties dump untreated stormwater into this undergrounded stream.

The APA needs to scrutinize the impacts of this project on this undergrounded stream, which pollutes Lake George because it receives untreated stormwater. The Development Considerations in Section 805 Section 4 of the APA Act clearly include stream habitat protection and impacts on drainage, runoff, existing flow characteristics, and water quality as an issue.

Stormwater Management: The applicant should be asked about making use of pervious pavement in the parking lot. The infiltration trenches and other devices do not seem adequate to handle storms of 1 inch or more. The site should be verified to see if existing infrastructure drains into the buried stream mentioned above.

During construction the large sidewalk in front of the hotel will be ripped up and replaced. The APA should ensure that a pervious pavement sidewalk is installed. This sidewalk should include tree wells big enough for mature trees. PROTECT also urges the applicant to investigate a green roof for the hotel.

Last, the APA should investigate whether the parking lot meets the Lake George Village codes for 10% code pervious area. We do not believe that it does. There are ample opportunities for stormwater retrofits on the parking lot design.

Size and Scale: Local concerns have focused on the massive change in scale from the existing row of 2-story restaurants to a long monolithic 6-story hotel. Local residents argue it’s simply too big and disrupts community character.

Here’s what one Lake George resident wrote about the Village approval and the Lake George Marriott proposal in the Post Star:

“Very disappointing decision. I would hope that anyone who is concerned, whether they are for or against

this project actually go to the site and stand there in front of Barleycorns or one of the other 2 story buildings there. Then picture something that is 3 times higher!!! Need another perspective...the high school gym is about 2.5 stories high. Picture something that is going to be over twice as high as that standing next to it. It simply does not fit in the village, especially on the postage stamp piece of property they are trying to shoe-horn this thing into. Yes, Mr. Kenny has a right to use the property he purchased, but not to the detriment of all who love and live or visit Lake George. This project is a monstrosity and I can only hope the APA will have the common sense to say no.”

Many local residents share this concern that the Lake George Marriott is out of scale with all other commercial facilities in that part of town. The only other building that comes close to the Lake George Marriott in height is the 5-story Fort William Henry. The major difference is that the Fort William Henry is part of a 15-acre parcel and is set back from the road.

Alternative Designs: The proposed Marriott has a large parking lot in the back of its proposed 6-story building. What if the hotel included a 2-story parking garage and then put hotel rooms and conference center facilities over the parking garage. In this way, could the whole building be lowered to a 4-story, rather than 6-story building? That opens up an option to move the restaurant to a large roof than could be designed as an attractive green roof with outdoor seating. It would provide stunning views for patrons of Lake George and Prospect and French Mountains, yet not be nearly as disruptive in size and scale as the current design.

Public Meeting: PROTECT notes that a number of concerned local residents have requested that the APA hold a public meeting in Lake George to hear concerns about this project. PROTECT supports this request.

On behalf of the Board of Directors of Protect the Adirondacks, please let me extend our appreciation for the opportunity to submit these public comments on this important project.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Bauer". The signature is fluid and cursive, with a large initial "P" and "B".

Peter Bauer
Executive Director