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**Via Email**

August 21, 2024

Devan Korn  
Environmental Program Specialist 2  
Adirondack Park Agency  
P.O. Box 99  
Ray Brook, NY. 12977

**Re: Chazy Lake, LLC Major Project Application  
Town of Dannemora, Clinton County  
APA PROJECT NO. 2024-0203**

Dear Mr. Korn:

Protect the Adirondacks! Inc. ("PROTECT") has reviewed the above-referenced application for development of a 257-site campground with associated amenities on an undeveloped 146-acre parcel bordering Chazy Lake and classified as Low Intensity Use and Rural Use by the Adirondack Park Land Use and Development Plan. The project is a Class A regional project pursuant to Executive Law § 810(c)(3) because it is a subdivision of land in a Low Intensity Use area "involving one hundred or more residential lots, parcels or sites or residential units, whether designed for permanent, seasonal or transient use").

As proposed, the project would involve development of 231 recreational vehicle ("RV") sites and 26 tent sites that would be accessed via NYS Route 374. The project would include construction of a check-in area and clubhouse with a camp store, bathrooms, laundry, covered seating, a dog park, mini golf and outdoor game area. The project would also include a playground, communal areas with fire pits, floating docks, a beach, and walking trails. In addition, the project will involve construction of impervious surfaces including roads, parking areas, concrete pads for the clubhouse and comfort stations; three comfort stations including bathroom facilities and showers; two storage sheds; and an unspecified number of on-site sewage disposal systems. Each RV site would be 2,800 square feet and each tent site would be 1,400 square feet. Hours of operation would be 24/7 from Memorial Day weekend through Labor Day weekend. The project site includes approximately 150 feet of shoreline frontage on Chazy Lake.

**Protect the Adirondacks**

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## General Comments

PROTECT has been contacted by residents who are concerned about the potential environmental, recreational, aesthetic and social impacts of this large-scale development on Chazy Lake. The project application falls far short of addressing, or even discussing, these concerns, and the application is incomplete in a number of significant respects. For example, the application does not include engineering drawings for the on-site wastewater treatment systems; lacks any baseline information concerning fish and wildlife present on the project site and in and around Chazy Lake and potential impacts of the project on those species and their habitat; lacks any information concerning management of stormwater runoff, erosion and sediment from the project site; does not include any discussion or analysis of the environmental and social impacts of a project that will bring thousands of people to a relatively small and sparsely developed lake—doubling the number of people that currently live on and recreate on Chazy Lake; and does not include a phasing plan even though the application states that the project will be developed in phases.

## Specific Comments

**Impacts of Heavy Visitor Use:** According to the application, upon completion of the project the maximum campsite capacity will be 1,542, and the campground will host between 257 and 514 people each day during the Spring, and between 514 and 1,028 people each day during the Summer. Applic. at 11. Season totals are expected to be nearly 9,000 individuals during the Spring and nearly 36,000 individuals during the Summer. *Id.* The application fails to discuss or evaluate the environmental and social impacts of such a large influx of people. The application should, at a minimum, include discussion of alternative designs that reduce the scale of the project and the scope and intensity of use.

Chazy Lake is a relatively small lake, less than 1,900 acres in size. There are currently only 273 permanent and seasonal residences on the lake. Assuming, conservatively, that each existing residence is used by four to five individuals, it means that at peak (full) residency there are approximately 1,000 to 1,300 people residing at Chazy Lake. The application states that on peak use dates, the campground will host up to 1,028 people. Thus, the project will double the number of people using the lake and its environs. This is probably an underestimate, given that many of the existing residences are occupied by couples, and the campground capacity is 1,542 individuals. The application does not include any assessment of the impact of this massive influx of users on the lake's water quality, the fish and wildlife utilizing the lake for feeding, habitat and breeding, or the recreational experience of other users.

In addition, the application proposes to provide lake access to the thousands of people anticipated to use the campground through a relatively tiny stretch of beach that is directly adjacent to existing residences. This small stretch of beach is proposed to include two floating docks and three fire rings. There is no discussion in the application how the thousands of visitors anticipated by the campground will be accommodated on this small beach parcel or the impact on such intensive use on nearby residences and other recreational users. The application states that the campground will be in operation 24/7, but includes no information on whether and how use of the beach access parcel will be restricted or controlled, how many and what types of watercraft will be using the floating docks, or how noise and other intrusive activities associated with the campground and the

beach access parcel will be controlled. PROTECT is unaware of another location in the Adirondack Park where a tourist accommodation for 1,500 people provides access to a small lake via a small beach that will be used for an assortment of activities such as sunbathing, swimming, canoe/kayak launching, as well as campfires.

**On-site Wastewater Treatment:** The application states that municipal wastewater treatment is not available at the project site and that individual on-site wastewater treatment will be required. Applic. at 8. Although the project site plan includes a vague schematic labeled “proposed area for wastewater treatment,” no additional details are provided, such as whether that single location will provide wastewater treatment for all sources of wastewater on the project site. If that single location is proposed to treat all wastewater from the site, it should be relocated to an area of the project site that is further from the lake. In addition, the application does not include detailed engineering design plans for the wastewater treatment system prepared by a NYS-licensed engineer as required by APA.

Furthermore, the application fails to state whether each RV site will hook up to the main septic system or whether there will be separate sewage discharge stations for the vehicles.

**Fish and Wildlife Impacts:** As noted above, the application is deficient in that it fails to include any baseline information concerning the presence of fish and wildlife on the project site and in and around Chazy Lake and the potential impacts of the project on those species and their habitat. Given the significant increase in visitor use and human presence that would result from the project, the application must include an evaluation of these potential fish and wildlife impacts. This is particularly crucial for disturbance-sensitive species such as loons, which currently nest on Chazy Lake, and bald eagles, which have been observed foraging on the lake.

**Wetlands:** The application acknowledges that there are wetlands present on the project site, Applic. at 7, but the only information provided concerning the location and extent of wetlands is a single page in the “Property Report” prepared by Landgate (“Landgate Rpt.”) and attached to the application. That page is a map that purports to show the location of “federal wetlands” on the project site. Landgate Rpt. At 6. The report does not explain what the depiction of “federal wetlands,” means, but if it is intended to refer to wetlands regulated under Section 404 of the federal Clean Water Act then it is incomplete because federally regulated wetlands do not include all wetlands regulated by APA pursuant to the Freshwater Wetlands Act and APA’s implementing regulations (9 NYCRR Part 578). In addition, there is no indication that the location and extent of wetlands on the project site was verified in the field, or that wetlands on the site were delineated by a professional qualified to delineate wetlands. In fact, according to its website, Landgate is a real property company that assists property owners with leasing options. It is not an environmental consulting firm and apparently does not employ any environmental professionals. See [www.landgate.com](http://www.landgate.com).

**Water Quality:** For more than 20 years Chazy Lake has been enrolled in the Adirondack Lake Assessment Program (ALAP) for water quality monitoring. ALAP is jointly managed by The Adirondack Watershed Institute at Paul Smith’s College and PROTECT. ALAP data shows that Chazy Lake is experiencing declining water clarity, and rising color, phosphorus, nitrogen and chlorophyll-a levels. Given these trends, the project’s replacement of intact forest, fields and

permeable surfaces with impervious surfaces will reduce natural water filtering and increase the flow of nutrients and pollutants into the lake. The application fails to include a stormwater management plan, which critical to preventing adverse water quality impacts to Chazy Lake.

**Traffic Impacts:** The application states that between the peak hours of 10 a.m. to 4 p.m. during the busiest part of the season there will be 30-32 cars and 6-7 RVs. Applic. at 11. The application provides no explanation of the basis for these estimates, fails to provide any baseline traffic data for NYS Route 374, and fails to assess the impacts of the anticipated additional vehicular traffic. This information should be provided. In addition, access to the campground will be from NYS Route 374, id., but the application fails to include a copy of a NYS Department of Transportation highway access permit as required by APA.

**Erosion and Sediment Control:** The application fails to include an erosion and sediment control plan as required by APA.

**RV Storage:** The application fails to address whether the 231 RVs at the site will be permanently placed there or will be required to be removed at the conclusion of the season after Labor Day weekend. This is a significant aspect of the project's scenic and aesthetic impacts as well as its potential to become an essentially permanent subdivision with hundreds of permanent seasonal residences that will require a significantly different wastewater treatment plan.

**Screening:** The application states that landscape development will be included as part of the project. Applic. at 9. Given the proximity of Chazy Lake and existing residences to the proposed campground sites, it is essential that a substantial buffer be established that is sufficient to visually screen the campground and provide an adequate buffer to avoid or mitigate noise impacts. The application states that there will be a 50-foot buffer between the campground and adjacent roads and residences, but only 20 feet of the buffer will be vegetated with a "hedgerow." Applic. Diagram 27. It is unlikely that a hedgerow will provide sufficient visual screening and noise buffer from nearly 300 campsites. In addition, the application states that tree saplings will be transplanted from the existing hedgerow, which will further diminish the existing vegetative screen. Consequently, the proposed landscape plan does not provide sufficient visual and noise screening for a campground of this size in such close proximity to existing residences and Chazy Lake. In addition, the landscape plan includes no provisions for restoring shoreline vegetation along Chazy Lake to buffer noise from the campground and provide further screening of the campground's beach access parcel, which is a significant omission.

**Exterior Lighting:** The application states that there will be no exterior lighting for the campground. Applic. at 5. This is difficult to believe, given that the campground will include roads, parking areas, walking paths, a clubhouse, grocery store, bathroom facilities and other amenities for thousands of people. Information on proposed exterior lighting, and how it will be designed to avoid or mitigate visual impacts, should be provided.

**Phasing Plan:** The application states that the project will be developed in phases, but it provides no phasing plan detailing how the development will be phased or a timetable for the phased development. Applic. at 5. A detailed phasing plan should be provided. APA must consider the impacts of the entire project, not just the first phase. This is particularly important given that a

motorboat launch was originally proposed and then withdrawn. If the plan is ultimately to provide motorboat access to the lake for thousands of people, the environmental and social impacts of this key aspect of the project must be evaluated up front. Likewise, if the plan is to ultimately develop more of the project site in future phases, this too must be evaluated as part of the current application.

**Subdivision of Land:** The application incorrectly claims that the project does not involve the subdivision of land. Applic. at 3. In fact, the project proposes the “division of land into two or more . . . sites . . . for the purpose of . . . lease . . . or any form of separate . . . occupancy” and therefore constitutes a subdivision. Executive Law § 802(63).

On behalf of the Board of Directors of Protect the Adirondacks, please accept our gratitude for the opportunity to share our comments on this major proposed project.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Amato", written in a cursive style.

Christopher Amato  
Conservation Director and Counsel