



**Board of Directors**

November 14, 2024

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**Chair**

Planning Board of the Town of Lake Luzerne  
539 Lake Avenue – PO Box 370  
Lake Luzerne, NY 12846

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Chris Walsh  
**Secretary**

**Re: Proposed Luzerne Woods Subdivision Development Project by  
Luzerne Woods, LLC and Luzerne Estates, LLC**  
Sagamore Street, Milrose Lane and Lake Tour Road  
Tax Map Parcels: 298.20-1-34, 298.16-3-50.1, 298.16-3-55, 299.13-1-3,  
299.13-1-4, 299.13-1-5, 299.13-1-6

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Dear Planning Board Members:

Protect the Adirondacks (“PROTECT”) offers these comments for your consideration regarding the October 10, 2024 application by Luzerne Woods, LLC and Luzerne Estates, LLC (“Applicant”) for an 18-lot subdivision located on Sagamore Street, Milrose Lane and Lake Tour Road. The Applicant plans to develop a 33-acre forested site with 18 lots for the construction of 18 single family residences with individual onsite wastewater systems. Access rights to Lake Luzerne would be provided through a single beach lot known as Camp Teck Beach, in close proximity to the Luzerne Music Center.

**Environmental Resources Analysis**

**Staff**

We previously wrote to you regarding our concerns about the proposed subdivision’s impacts on protected surface waters, ground waters and species of special concern on the project site and in the areas surrounding the project site. A copy of our prior letter to the Planning Board dated August 26, 2024 is enclosed for your reference. We continue to have these concerns.

Peter Bauer  
**Executive Director**

Claudia K. Braymer, Esq.  
**Deputy Director**

Christopher Amato, Esq.  
**Conservation Director  
and Counsel**

Moreover, upon reviewing the Applicant’s proposed subdivision plan (sheet 4 of the application maps dated October 10, 2024), the Applicant is proposing to locate a subdivision road – the extension of Milrose Lane – the water line, and stormwater management features directly through the middle of the property where a wetlands area has been identified on the site. Notably, the Applicant’s wetlands delineation was apparently performed in January 2024, a difficult if not impossible time of the year to accurately examine the extent of wetlands

**Protect the Adirondacks**

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and wetlands vegetation. Thus, the proposed road, water line and stormwater management features in the middle of the property have the potential to negatively impact the wetlands located in that area.

The Applicant is claiming in its October 2024 application that the “[o]n-site wetlands have been determined to be non-jurisdictional by the Adirondack Park Agency”. However, the Adirondack Park Agency’s October 22, 2024 letter to the Applicant states that an “updated field inspection by Agency staff is the only way to confirm the presence of any wetlands” and that a “site visit” should be arranged. There does not appear to be any indication that a site visit by Adirondack Park Agency staff has occurred since October 22, 2024. Accordingly, the Planning Board should not proceed with reviewing the application until more information is known about the extent of the wetlands on the property.

**Potential for Significant Adverse Environmental Impacts**

Given the potential for significant adverse impacts to natural resources from the proposed subdivision, including the proposed clearcutting of 14.5 acres of forest land, and the potential for adverse impacts to archaeological or historic sites, we urge the Planning Board to issue a positive declaration pursuant to the State Environmental Quality Review Act and require the preparation of an environmental impact statement.

**Shoreline Access Lot**

According to the Applicant’s proposal, all 18 residences on the lots created by proposed subdivision will have access to Lake Luzerne through a single shoreline access lot located off of Sagamore Street, known as Camp Teck Beach. It is unclear how many people already use the shoreline lot to access the beach on the Lake. The impact of the increased number of residents walking and driving UTVs to and using the beach on the shoreline lot is concerning. There is no discussion in the application materials of measures (such as tree/vegetation planting, shoreline restoration, and a bathroom facility) to protect the natural resources on the shoreline and on the Lake from the additional users at the beach. In addition, there is no discussion in the application materials of measures (such as landscaping or tree/vegetation planting to screen the lot) to mitigate the noise and activity from the additional people at the beach. The Applicant’s Planting Plan does not include anything for the shoreline line. The Planning Board should insist that there be protective measures added to protect the Lake and the neighboring and nearby landowners such as the Luzerne Music Center.

**Subdivision Design Review**

We reiterate our concern that the Planning Board did not have any independent review by the Town’s engineer and did not receive any public comment or input on the Applicant’s “Conservation Analysis Report”. Counting the slivers of space between the roads and between individual subdivision lots is not true conservation of the remaining developable lands. The layout of the lots should be more closely clustered together to leave greater areas of unfragmented parcels of forested lands. We urge the Planning Board to require the removal of

the three lots (lots 12, 13 and 14) at the southern end of the project to leave that block of existing forest undisturbed and unfragmented from the surrounding forest. That stretch of existing forest should remain permanently forested to protect the adjoining wetland and stream located on the Lake Luzerne Water District parcel.

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

Sincerely,

A handwritten signature in black ink that reads "Claudia K. Braymer". The signature is written in a cursive, flowing style.

Claudia Braymer,  
Deputy Director

enc.

cc: Hon. Eugene Merlino, Town Supervisor  
Town Board Members  
Matthew Brown, Project Administrator, APA