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DEPARTMENT OF ENVIRONMENTAL PROTECTION  
OFFICE OF ADJUDICATIONS

George Stadel Comments re Magee Boatyard - 2/6/2013

It is doubtful that the proposed yard is a viable business.

The business plan is bad.

They intend to dry store 192 boats. In other words the boats would be launched when used then hauled when they come back in. But using both the forklift and travel lift, at most 6 boats could be hauled per hour. If only 15% of the boats go out on a Saturday and come back in the evening, it would take 5 hours to haul them.

The forklift pier deck is 14.8' above MLW. Large forklifts have a reach below base of 12' or less. So for the forklift to reach 2' below water to pick up a boat, it could only haul boats when the water level is above about 5' above MLW, or about 4 consecutive hours in a twelve hour period.

The proposed yard is next to a sewage treatment plant. The effluent pumps, UV disinfection system, etc. can handle 24 million gal/day. The maximum flow in one day in the last 4 years was over 60 million gallons. If the plant is ever in perfect working order, it will still release partially treated effluent every heavy rain. Similarly, even if the odor control system is in perfect working order, it will still emit sewage odors every hot summer day.

The design of water areas is bad.

It is unlikely that the channel is adequate to support both commercial barge traffic and the total number of boats currently using the area. Yet no traffic study has been done.

The floating docks are inadequate to handle the proposed number of boats. Rafting of boats would impinge on the federal channel. Even without rafting, the floating docks and travel lift piers are too close to the channel.

The design of land areas is bad.

There is a rigging shop but no place to store or work on a sailboat and no work dock.

Racks are shown as 10 ft. wide, which would provide adequate support for boats only up to 20 ft. long. The racks are 300 ft. long for 30 boats. Subtracting rack structure and space between boats this could accommodate only 22 ft. boats.

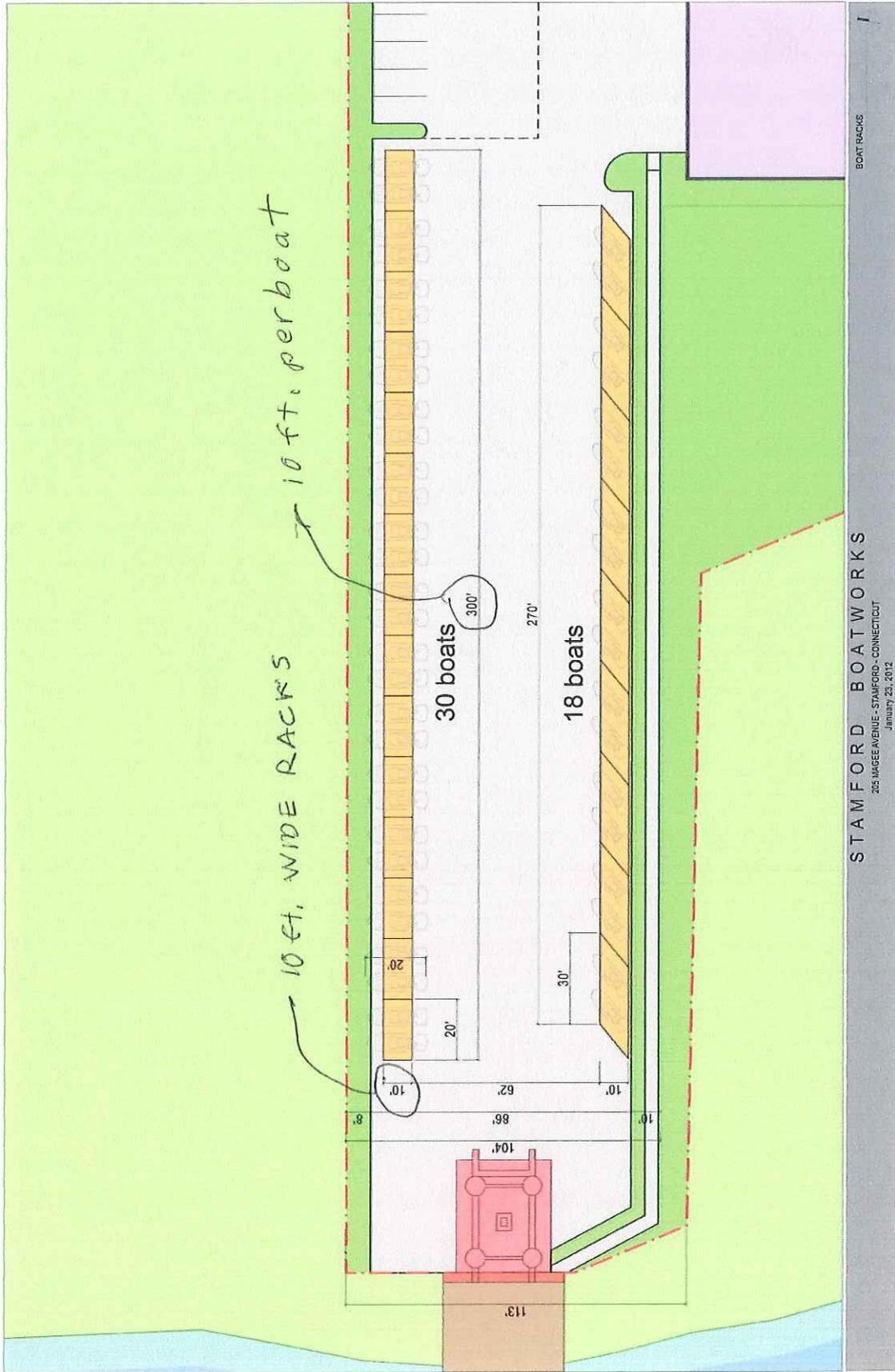
The dredging plan is inadequate.

Silting on the west side of the channel forces tugs to hug the east side to get barges around the bend without running aground. To prevent damage to boats at the floating docks, the west side of the channel would have to be dredged and the floating docks and travel lift piers would have to be set back an additional 10' to 15'.

It will be impossible to attract customers under these conditions.

A company intending to start a boatyard business would have had studies done to judge its economic feasibility and would know all this before reaching the permitting stage. But this company's intent is not to build a viable boatyard but to get around its obligations to the City in order to get a \$750 million project. I trust you won't be drawn into this for the sake of a project that is likely doomed to failure and may not even be completed.





STAMFORD BOATWORKS  
 205 HAGEE AVENUE - STAMFORD - CONNECTICUT  
 January 23, 2012