

1. **Setback:**

The 20' setback is based on a 10' depth on the "bank" of the channel bottom where it meets the Federal demarkation line, not on the 12' depth of the channel.

2. **Shallow Draft:** Things stood out on shallow draft interior channels:

"Turning space for small boats should be sufficient to allow turning without backing or assistance." The "without backing" part limits boat size and bears a further look. What they call "present recommended simple guidance" calls for a minimum channel width $W = W_{min} + 0.10 NB$, where $W_{min} = 50'$ or $5 B$, whichever is greater, $B =$ average beam of boats using the channel and $NB =$ "number of boats using the project." Note that it is not the number of boats per hour or per day but the total number of boats. That would include the boats on the other side of the channel and the barges. 300 boats at an average beam of 12' would give a minimum channel width of 90'. Judging very roughly off the computer monitor, the channel width at the north end is about 85'. At the hurricane barrier you would have to include all the other boats north of the barrier.

The proposed yard is at the outside of a bend in the channel. A light (unloaded) barge making that turn would tend to drift to the outside of the bend, especially with a fresh northwest breeze. Note on figure 3 of the application the shape of the federal channel at that point to account for the possibility of drift. This poses a real danger to any boat laying alongside the proposed dock.

3. **Docks.**

The north end of the dock is about 240 yards south of the 5' diameter sewage effluent discharge pipe that discharges partially treated effluent with above the allowable suspended solids every heavy rain, 43 million gallons of it once last fall. What are the OSHA rules for the workers cleaning this off boat bottoms?

4. **Yard:**

How long does it take for a forklift to haul a boat at low tide, wash off the "suspended solids", put it in a rack and return to haul the next boat? How long would it take to launch or haul those 40 boats?

5. **Dredging:**

Kristen's assurance that dredging inside a silt fence is safe was not backed up by solid information on the toxicity parameters of materials found. Questions remain about sheet piling the site and the need for capping material.

6. **Safety:**

Concerns in the channel must be addressed. A traffic study along with a detailed plan of operations of the site needs to be done.

