- Tugs commit to west branch as they make the port turn from the main channel transit line. At that point, they have nowhere else to go except the docks/turning basin at the north end of the west branch.

- Barge operators are presently using barges substantially bigger (in loa, beam, draft and GVW) to those traditionally used. This increases the space needed to operate with an acceptable safety margin. (No incidents have been reported this year).
  - I wonder if anyone has actually been on the water in the vicinity of the new barges being maneuvered, they really are quite imposing (Photos) and give a different perspective. (Caution against any one getting close – ask me and I will arrange)

- Proposed boat yard docks encroach on the presently open water available for tugs/barges to maneuver if needed and are in the exact location this years' fireworks barge was set loose by its towing vessel before being re-acquired.
  - (The provided plans are inadequate for proper review of navigational safety as they do not locate the proposed docks within existing structure or navigable waters.)

- Proposed fuel docks, incorporating sewage tank water pump out is the north east most point of proposed boat yard docks. They would be the first structure encountered by an outbound tow that got out of shape with a very real likelihood of pollution from both oil and sewage.
  - Note; the 'old' fuel dock (and for that matter the present fuel dock at the temporary boat yard) may at first appear to be equally exposed. However, it was (is) slightly set back from adjacent docks to both north and south providing a certain amount of protection.

- Recreational boats staging for fuel, pump out, haul out or dock space have no safe area to use while waiting their turn when commercial traffic is operating. We already have some issues developing between the rental kayaks and wind surfers and the resident recreational boats docked in the west branch. Adding the traffic from a boatyard into the middle of the mix would raise the risk to a much higher level.

- Ice. The past 2 winters has seen 4 incidents of ice damage to boats and structure resulting in the transit of oil barges. Again, the exposed nature of the fuel and sewage pump out dock increases the risk of a spill, *unless the intent is for the fuel and pump out to not operate year round?*

- A proper risk assessment is not going to be completed in an afternoon around a coffee table. It would require research and data. Any 'quick-fix' that suddenly materializes will be inadequate and for 'public relations' purposes only. Any risk assessment should be subject to peer review, (not a business or planning consultant).

- Since my presentation to Planning Board which identified deficiencies in the preparation of the city peer review report and identified that no adequate navigational risk assessment and mitigation had been conducted, I have been contacted by Mr. Buckley from BLT and asked for a meeting together with their boat yard 'expert' to identify the risks (and presumably mitigate them for the developer). This sudden realization of risk (after it has been publically recognized) might at first seem commendable. However, I believe that it shows a lack of understanding of actual circumstances in our harbor and possible naivety concerning the interaction of recreational boaters with commercial maritime operations.

Updated 2/26/2018

In addition to the above discussion points dated 10/20/2015, we now have the following additional factors in the west branch of the harbor that add to the high risk of an incident with serious or fatal consequences;

- 3 or 4 dock'n'dine restaurants that attract boaters who are not familiar with the harbor and it's unique safety issues,
- Rental kayaks and stand up paddle boards from Boccuzzi Park. These are run by Soundwaters who also operate a large fleet of small sail training boats for children/youths. This operation is generally well organized by Soundwaters.

- Boat 'ownership club (Carefree Boats) that operate four 20 to 25 foot outboard boats, additionally for the 2018 season, they have added two additional boats for 'hourly' rental. This type of use does not require the operator to have attended a safe boating class or obtained a CT safe boating certificate.
- Carefree Boats is also going to be operating rental kayaks and stand up paddle boards. In the past, there have been numerous safety issues with rental craft operating from their docks.
- Carefree boats is also going to be running a 6-Pack boat for '1-hour' tours of the harbor and as a water taxi.

All the above boats/operations come into frequent close quarters situations with commercial tugs and barges. There is a high risk of such interaction resulting in an accident with serious or fatal consequences.

The only safety patrols in the harbor are the Stamford Police Harbor Unit (2-men, supplemented by 2 seasonal officers) and the Harbor Master and Deputy Harbor Master, both of whom are part time and unpaid.

This is insufficient for safety.