

From the desk of
Captain Sam Zapadinsky

To whom it may concern:

I have prepared these comments to voice my support for the addition of new federal anchorage grounds in the Hudson River between Yonkers and Kingston. I serve the Hudson River as an active NYS licensed Hudson River Pilot and my comments are in addition to those submitted by the Hudson River Pilots' Association. Further, my family lives in a town along the banks of the Hudson River. To say that I have an interest in the preservation of the environment of the Hudson River, as well as safe commerce would be an understatement.

It's been my observation that all major ports in the US and abroad have clear anchorage grounds identified where vessels that serve those ports can secure there for typical reasons to anchor. It is neither common, nor safe to have to transit over 50 nautical miles to find a safe anchorage. The Hudson River anchorage grounds proposed on this docket are those that have been historically used for various purposes and should have been drawn in generations ago. As long as commerce is moving up and down the river, the masters and pilots of the vessels serving the needs of industry should have numerous safe anchorages identified along their route in the places proposed. Providing the mariners that work on the river with more anchorage choices allows them to continue the great work of serving the Hudson River Valley.

Those opposed to the proposal fear that the Hudson River will become a parking lot for barges. As an active pilot, I, too, do not want to see any vessel anchored in the river if they have no orders or have no business to conduct in the river. Vessels proceeding to Albany that must delay their trip to await berth availability rarely have to wait longer than 48 hours for their berth to clear. As mentioned in the comments by the Hudson River Pilots' Association, I believe limiting the use of proposed anchorages to 48 hours unless directed by the COTP makes sense, and addresses those concerns.

Those opposed also assume that vessels can anchor anywhere they need, they just have to ask the USCG for permission. Although this may be true, having clearly defined anchorages on the chart ensures that mariners, who are looking to drop the hook due to a change in their voyage, have a safe place to anchor that will not endanger their vessel, other vessels, or the environment. Should a vessel encounter an issue with propulsion, auxiliary power generation, steering, visibility, berth availability, or any other issue, the USCG should provide them with a clearly marked place to proceed to safe anchorage quickly. The only alternative would be to have the vessel's captain or ship pilot look through the chart, and select a place to go that can serve their draft, with good holding ground, that is also free of any cables, pipelines, obstructions, or wrecks. These tug captains and pilots must also keep in mind that if they anchor outside a federal anchorage in the Hudson River that they stand to be fined \$40,000 per the MSIB sent out to mariners in 2015. Should a vessel master working in the Hudson River encounter

anything unexpected during his voyage, I want them to have all the tools necessary to safely, easily, and quickly anchor a vessel until it is safe to proceed with the voyage.

It is also important to clearly define anchorage grounds for the Hudson River now, before future cable line projects or pipeline installations are approved. There are projects already proposed, namely the Champlain Hudson Power Express (CHPE), that plan to use navigable waters of the Hudson River to run a submerged power cable to connect Canada to the NY Metro Area. Once this submerged cable is in place, a vessel in need of a safe anchorage may quickly run out of options. This will only endanger both the vessel and environment of Hudson River Valley. I find it interesting that the very people that oppose these anchorages and say they are “dangerous” are in support of this proposed submerged power cable.

Those opposed to the docket often state they do not want oil to move on the Hudson River. The tugboat captains and pilots that serve the ports in the Hudson River move heavy lift products such as turbines and generators, as well as dry bulk cargoes such as road salt, gypsum, wheat, corn, and scrap steel. We move liquid bulk cargoes such as asphalt, molasses, urea fertilizer, and crude and refined oils. The anchorages proposed will offer all vessels moving any cargo a chance to safely anchor if the need arises. To assume that a limit can be placed on one type of cargo, or to assume that only one type of cargo moves on the river is ludicrous.

Those opposed often refer to the pollution that these anchorages would cause. They often state how clean the river is now, after so many years of pollution. I am very proud to say the maritime industry, including ALL the tugboats, barges and ships that ply these waters year after year to serve the needs of the Hudson Valley DID NOT cause the pollution that they talk about. In fact, the mariners ARE RESPONSIBLE for helping clean it up. General Electric polluted the river with PCB's. The tugboats and barges tending the dredges and spoil barges ultimately cleaned up, and will continue to clean up, GE's mess for years to come. Also, many mayors, as well as federal and state representatives and senators of river towns represent municipalities that often dump raw sewage into the Hudson River after heavy rains. The maritime industry that works in the Hudson River has a stellar record of caring for the environment while serving the needs of commerce. I take keeping our estuary clean very seriously. I am also very close with many tugboat captains and mates and know those that serve on Hudson River also take keeping the river clean seriously.

In conclusion, I strongly support the approval of proposed anchorage grounds with reasonable anchorage time limits in place. Adding these federal anchorages will enhance the safety of traffic on the river for generations of mariners to come. Thank you in advance for taking the time to review these comments.

Respectfully,



Sam Zapadinsky