

**Comments of the Boat Owners Association of The United States  
Regarding the Establishment of New Commercial Anchorage Grounds  
in the Hudson River from Yonkers, NY, to Kingston, NY  
Docket Number USCG-2016-0132**

**December 6, 2016**

BoatU.S. is the largest organization of recreational boaters in the United States, with more than 540,000 members nationwide and over 32,000 members in New York State alone. For 50 years, we have worked to ensure that our members, who own a wide array of types and sizes of boats, can continue to enjoy this healthy outdoor family recreation. We are also one of the leading providers of boater safety and clean boating education through the BoatU.S. Foundation for Boating Safety and Clean Water. By way of background, we note that over seventy percent of the nation's boat owners have an annual household income of less than \$100,000. For many families, their boat is the single biggest investment they make in family recreation.

We appreciate the opportunity to comment on the proposal to establish new commercial anchorage grounds on the Hudson River that may have a significant negative impact on this truly national waterway.

We carefully follow the development of policies by federal and state agencies with responsibilities for managing the waterways used by millions of boaters. Cruising and fishing our shared waters is a major part of how many families spend precious recreational time together. The thoughtful implementation of management policies that affect the full range of waterborne activities is of paramount importance to BoatU.S. and to the overall public support for the stewardship of public lands and waters.

In reviewing the proposed new commercial anchorages on the Hudson River, we have significant concerns with the location, size, and the potential for these anchorages to be used as long-term storage of bulk commodities on commercial barges. We recognize these are shared waterways but believe that if this proposal is adopted in its current form it will have serious, negative long-term consequences for recreational boating in the area.

The proposal for ten new commercial anchorages represents a major expansion of area where recreational boaters will be compelled to contend with large vessels. Some of the proposed anchorages will be in close proximity to long-standing recreational vessel mooring fields, racecourses and marinas, increasing the potential for collisions. These anchorages will be located on waters heavily trafficked by recreational boaters, reducing the width and in some cases occupying nearly the entire navigable channel. Given the disproportional length and mass of these barges, the increased risk to recreational boats must be considered.

We also have concern with the large areas proposed for each individual anchorage. When an anchorage is in use, the long anchor-line scope and large swing area required will place the barges close to or even impinge upon navigational channels. We note that most recreational boats do not have sophisticated electronic equipment such as radar and automatic identification system (AIS) receivers. This raises significant safety concerns for recreational boaters near these anchorages, particularly during periods of limited visibility or at night.

The indefinite time-periods allowed for the use of these anchorages is troubling, particularly if they are used for the storage of bulk commodity cargoes including petroleum. Part of the rationale provided for their establishment was to provide anchorages while tug-barge operators wait for better visibility or tides, conditions one would expect to change in a relatively short time period. Yet, nine of the ten anchorages are designated as long-term, which is undefined in the ANPRM, raising the question of exactly what is the purpose of the anchorages. Given the large recreational traffic and sensitive environment of the Hudson River, we do not believe it is appropriate to allow these anchorages to be used for long-term storage of commercial barges, particularly if they contain bulk commodities. The waterways should only be used for the careful transportation of petroleum products and not as a long-term storage solution.

We urge the U.S. Coast Guard to revise the proposed anchorages, reducing their number, size and limit their use from being used as long-term storage of commodities. We also suggest a specific definition of what constitutes long-term storage of commercial vessels be included in the final rule. We support a strong marine transportation system and recognize our country's energy needs are important. However, we also firmly believe the waterways must be carefully managed to protect free passage of vessels, provide full access for the public and protect the environment that draws so many to spend time and resources on their boats.

Thank you for your attention to the issues we have raised. BoatU.S. stands ready to provide the recreational boater perspective as this process moves forward. If you have any additional questions regarding this or any other boating issues, please contact David Kennedy, [Dkennedy@boat.us](mailto:Dkennedy@boat.us).