

June 30, 2016

**Via Electronic Mail**

Craig Lapiejko  
Waterways Management Branch  
Coast Guard First District  
Phone: 627-223-851  
Email: [craig.d.lapiejko@uscg.mil](mailto:craig.d.lapiejko@uscg.mil)

**Re: Public Meeting Request for Advance Notice of Proposed Rulemaking  
Anchorage Grounds, Hudson River; Yonkers, NY to Kingston, NY  
Docket No.: USCG-2016-0132, Posted June 9, 2016**

Dear Mr. Lapiejko:

Scenic Hudson is writing to request that the Coast Guard hold public meetings regarding the above-referenced proposed rule which would establish ten (10) new anchorage grounds along the Hudson River between Yonkers, NY and Kingston, NY. Scenic Hudson is requesting multiple public meetings be held to allow for maximum public input, given how large a geographic area the Coast Guard's proposal will cover, the potential for significant environmental and community impacts, and the significance of the proposed rule. Public meetings are necessary as opportunities for residents, boaters, and others in the affected area to understand the purpose of the new anchorages and communicate any concerns as early in the rulemaking process as possible.

**Scenic Hudson's Interest**

Scenic Hudson works to protect and restore the Hudson River as an irreplaceable national treasure and a vital resource for residents and visitors. A crusader for the valley since 1963, today we are the largest environmental group focused on the Hudson River Valley. Scenic Hudson combines land acquisition, support for agriculture, citizen-based advocacy and sophisticated planning tools to create environmentally healthy communities, champion smart economic growth, open up riverfronts to the public and preserve the valley's inspiring beauty and natural resources.

**The Potential Impacts and Significance of the Proposed Rule Require Holding Public Meetings Pursuant to Coast Guard Rulemaking Procedures**

The Coast Guard's proposed rule would establish ten (10) new anchorage grounds in the Hudson River between Yonkers, NY, and Kingston, NY. The proposed anchorages range between 47 and 715 acres in size, to accommodate a range of one to 15 vessels of

various drafts, for either long or short term anchorage. The approximate depths of the anchorage grounds range from 21 feet to 65 feet.

The proposed anchorages have the potential to result in significant environmental and community impacts. The Hudson River Estuary is an irreplaceable habitat and spawning ground for many fish species, including two federally endangered species: the Atlantic sturgeon and shortnosed sturgeon. The River also contains numerous New York State Department of State designated Significant Coastal Fish and Wildlife Habitats.<sup>1</sup> In fact, several of the new anchorages are proposed within these sensitive aquatic habitats. Increasing anchoring of large vessels with heavy ground tackle would cause damage to the river bottom habitat. The proposed anchorage grounds could disrupt already delicate ecosystems, impeding their recovery from other industrial uses of the River, and disturbing the natural rhythms of the River.

Scenic Hudson is particularly concerned about the potential use of the proposed anchorage areas by vessels carrying crude oil or refined petroleum products. Such use would increase the River's exposure to pollutants and the risk of an oil spill which would harm the ecosystem, eliminate the public's ability to use the River in the affected area, and potentially impact other commercial traffic.

The Hudson River is also home to many historic waterfront communities that have relied on the Hudson River for recreation and to support the tourism industry in the Hudson Valley. These communities have made significant investments in their waterfronts to make them desirable places to live, work and recreate. The proposed anchorage grounds are adjacent to many population centers including Kingston, Newburgh and several smaller communities. The proposed anchorages would place multiple commercial vessels at these waterfronts, creating light and noise pollution, impacting the use of hundreds of acres of river, and detracting from the River's natural beauty as seen from these places.

Given the local reliance on the river for tourism and recreation, its ecological importance and historic value, as well as the size of the area impacted, it would be in the best interest of the public for the Coast Guard to conduct public meetings. These public meetings could serve as a tool for the Coast Guard to educate the public, discuss the possible costs and benefits of the anchorage grounds, and hear the public's concerns about the proposed anchorages' potential impacts on the River and its communities.

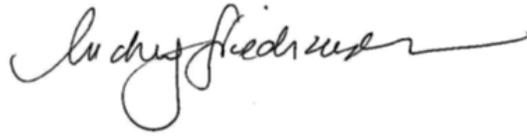
The scale of the potential impacts of the proposed anchorages makes the proposed rule a "significance regulatory action." It would therefore be appropriate to hold a public meeting near each of the 10 proposed anchorages. At a minimum, the Coast Guard should hold two public meetings, one near the southern range of the anchorage locations and one near the northern range. This will allow for input from differing constituencies and opportunities for input on more local concerns, opinions, and questions. This will aid the Coast Guard in developing a complete record for its decisionmaking.

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<sup>1</sup> *Significant Coastal Fish and Wildlife Habitats*, NEW YORK STATE, DEPARTMENT OF STATE, OFFICE OF PLANNING & DEVELOPMENT, <http://www.dos.ny.gov/opd/programs/consistency/scfwhabitats.html>

Thank you for your attention to this matter. Please contact me at afriedrichsen@scenichudson.org or (845) 473-4440 Ext. 226, should you have any questions or need additional information.

Respectfully,

A handwritten signature in cursive script, reading "Audrey Friedrichsen", enclosed in a thin black rectangular border.

Audrey Friedrichsen, Esq., LL.M.  
*Land Use and Environmental Advocacy Attorney*  
**Scenic Hudson, Inc.**