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PORT OF NEW YORK/NEW JERSEY**

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Edward J. Kelly

August 2, 2016

US Coast Guard

RE: Docket USCG-2016-0132

To Whom It May Concern,

Please accept this correspondence as a SUPPORT of Docket-2016-0132 regarding the advanced notice of proposed rulemaking pertaining to the establishment of necessary federally designated anchorage areas in the Hudson River.

The more than 540 paid members of the Maritime Association of the Port of NY/NJ (MAPONY/NJ) are firmly in SUPPORT of this docket because it will serve to provide critical infrastructure which is vital to the safe, secure and efficient transport of people and goods in the Hudson River.

Since 1873 the Maritime Association of the Port of NY/NJ (MAPONY/NJ), has been a primary advocate of the commercial maritime industry in the Port of NY/NJ. Our paid membership of over 500 members includes such a broad gamut of industrial maritime concerns as international shipping lines, marine terminals, organized longshore labor, maritime and docking pilots, agents, tug and barge owners/operators, Port Authority of NY/NJ, admiralty attorneys, marine underwriters, ship repair/construction facilities, and many others.

In a recent economic study, it was determined that in the year 2014 the Port Region was responsible for:

- Handling over \$208 Billion Cargo Value
- 640,820 vehicles
- 5.8 Million TEU of containerized cargo
- Largest USA Petroleum Port
- 4213 International vessel arrivals
- Over 400, 000 harbor transits/annum

As a result of the foregoing operational activity, the commercial maritime industry in our Port produced:

- 190,100 Direct JOBS
- 336,600 Full-time JOB equivalents
- \$21.2 Billion in Personal Income
- \$53.5 Billion in Business Income
- \$4.7 Billion Federal Tax Revenue
- \$2.3 Billion Local and State Tax Revenue

Additionally, it is well recognized that the marine transportation mode:

- Is the Cleanest and most environmentally friendly
- Is the most fuel efficient
- Requires minimal Infrastructure
- Reduces roadway congestion and wear/tear, thus reducing the need for public infrastructure expenditures
- Reduces emissions (air and water)
- Eliminates over 3.1 Million truck trips in NYC annually

In consideration of the foregoing facts, it should be clear that the safe, clean and efficient waterborne transport of people and freight is essential to the economy and environment of our Region.

It should also be noted that vessels and cargoes transiting the Hudson River navigation route have increased in both size and volume. Most recently, this channel has experienced a very large increase in petroleum products, and there has been an attendant increase in the size and capacity of the vessels, barges, and ATBs which transport these vital products. The website of the Albany Port District Commission lists the many large vessels and tugs that routinely called at Albany during 2013. The website further states that, "With the increased New York State interest in revitalizing the Erie and Champlain Canal Systems, comes increased potential for moving commercial products via water." Clearly, it is intended that the Hudson will see increased traffic and commercial activity by ever-increasing numbers of vessels.

The Federal Maritime Administration has designated the Hudson as one of their targeted American Marine Highway routes in recognition of the essential nature of this vital inland waterway which links inland areas with international marine transportation networks.

In consideration of the essential nature of our Region's need for increased waterborne transport capacity, the members of MAPONY/NJ SUPPORT undertakings that will serve to enhance the safety, security, and cost-effectiveness of waterborne transportation in our Region.

We trust that the USCG will take the following key facts into consideration as they determine the outcome of this docket:

- For centuries the Hudson River has been a primary waterborne commerce viaduct that has served the economic needs of our Region, and the USA
- The Hudson River carries bulk cargoes which are essential components of the daily economic requirements of our populace
- Anchorages are essential components of safe, secure, and environmentally friendly waterways.
- There currently are no formal anchorages on the Hudson River
- The proposed anchorages are already been in long usage by custom and practice
- The Hudson River requires sufficient anchorages to ensure navigational safety by allowing vessels designated areas in which to anchor when weather, visibility restrictions, emergencies, security requirements, and/or seasonal conditions constrict the ability to proceed safely.
- The proposed anchorages have been promulgated, discussed and agreed among the major commercial users of the waterway

- The projected increased usage of the Hudson River for both commercial and recreational usage demands that federal anchorages be established to facilitate the safe usage of the waterway.
- The Hudson River has been used for commercial waterborne transport for centuries, and there has not been any proven negative impact on the marine environment. In fact, water quality is better now than it has been for many years.
- The Hudson River has been a highly utilized commercial waterway for centuries. Any development along the river has been relatively recent. If one moves next to an airport, one should expect to experience a certain modicum of air traffic and noise. The same principle holds true on the waterway.

We look forward to working together to ensure that our Region is able to successfully realize the benefits of safe and secure navigation, of environmental improvements, reduced wear and tear on public roads and bridges, and the reduction in roadway congestion that are achievable by the increased use of waterborne transportation.

Very Truly Yours,

A handwritten signature in black ink, appearing to read 'E. Kelly', with a large, stylized flourish at the end.

Edward J. Kelly
Executive Director