

August 15, 2016

RDML Linda Fagan, District Commander
First Coast Guard District
408 Atlantic Avenue
Boston, MA 02110

Dear Ms. Fagan,

We, the Conservation Advisory Council of Peekskill, NY, are writing to you today in opposition of your proposed ruling Docket Number USCG-2016-0132. This is the maritime Association of the Port of New York/New Jersey Tug & Barge Committee's (T&BC) request for expanded anchorage sites in the Hudson River.

Although Peekskill is not on the list of proposed anchorage sites, the lower Hudson River is tidal (i.e., it flows both ways) and may, therefore, be impacted by any proposed upstream and downstream anchorages. Additionally, it is important that we stand with our surrounding communities and ask that these proposals be thoroughly evaluated, and our concerns not taken lightly.

The discussion in the primary supporting document outlines the intent to provide a significant increase in the number of federally approved anchorages, including "long-term" anchorages, from Yonkers to Kingston, where just one currently exists. What is more, the stated purpose for these proposed anchorages is to support the American Bakken Crude Oil and Ethanol industry. In addition, the T&BC letter also refers to shipping of "hazardous materials."

We agree that, according to the T&BC letter, "trade will increase on the Hudson River significantly over the next few years with the lifting of the ban on American Crude exports for foreign trade." We, however, object to the proposal's intent to put the Hudson River at risk by increasing the number of petroleum, ethanol, and other transport anchorages, especially with a provision for "long-term" anchorage. "Long term" anchorages have the serious potential to transform the Hudson River into a "tank farm," as tankers await a buyer, or worse, if tankers keep a "long term" holding pattern with a cargo hold of crude oil, ethanol, or other hazardous materials. By the T&BC's own admission, traffic on the Hudson has increased

dramatically. As such, the Hudson River will be at great risk of a collision if tankers are allowed to anchor up and down the river. The breach of a tanker in the Hudson due to a collision would be catastrophic to the Hudson River and all of the communities along its shores.

Until 2011, no crude oil was being transported on the river. Have spill response plans been developed to respond adequately to spills of crude oil? Accidents will most likely happen. The impacts of new anchorage grounds have not been adequately studied nor identified. Has climate-change modeling been applied to this anchorage proposal?

With the increased risk of accident and pollution, the Peekskill CAC does not believe such re-industrialization of the Hudson River is in the best interests of the City of Peekskill's waterfront revitalization efforts and will, in fact, reverse the momentum achieved in recent years toward that goal. The Peekskill CAC believes that expansion of this industry on our waterfront will bring, at best, zero value to our communities.

Finally, we must point out that the Tompkins Cove's proposed anchorage site is in close proximity to Indian Point & the pipelines running underneath the River. All three of these together are a recipe for disaster and could be a national security nightmare. The Peekskill CAC believes that the Hudson Valley is not prepared to handle such an issue nor do the supporting documents indicate that the industry is capable of handling it. We refuse to accept spill clean-up as the cost of doing business.

We implore the USCG to reject the entire proposal.

Thank you.

Sincerely,

Peekskill's Conservation Advisory Council

Kathleen Barthelmes, Chair

John Drake

Leigh Draper

Dorothy Leslie

Jeff Miller

Lise Prown

Vanessa Agudelo, volunteer member

