

S.A. RICHTER MARINE CONSULTANT INC.

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Expert testimony, Case preparation, Safety and Navigation consultant

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RIN 1625-AA01

Anchorage Grounds, Hudson River;

Yonkers, NY to Kingston, NY\

To Whom It May Concern:

I am writing to strongly support the Hudson River Anchorages as proposed be approved as presented in the Advance Notice Proposed Rule Making (ANPRM).

I am a federal licensed pilot as well as a state licensed Docking pilot in NJ. I have piloted vessels on the Hudson River for years including presently.

For years the wide section of the river below the Rondout Creek and other areas have operated as anchoring grounds for vessels. While we generally attempt to pilot in one "straight shot" without anchoring during the voyage, occasionally a vessel must anchor, in times of reduced visibility, changes in berth assignments or especially in the winter mos. when it is particularly hazardous to pilot or navigate above Kingston in hours of darkness.

There is a great deal of "misinformation" being presented, implying or stating outright companies and individuals will utilize established anchorage areas in order to "store oil" on the river or to possibly "fleet vessels" in these areas. This is totally false and would not be the case. No one is suggesting allowing the anchorages to be used for storage or for unmanned vessels. This is wholly in order to arrange for a safe place to temporarily (generally 12 hours or less) anchor a vessel while it is making a north bound transit to plan for a timed arrival in the port of Albany, to await day light in order to safely navigate the more technically demanding portions of the river above Kingston, and in case of emergency or to stop and not proceed during times of poor visibility.

I grew up on the Hudson River, in Kingston. My first job as a kid was working at Kingston Point Beach, I have volunteered at the Clearwater Festival in the past. I am a environmentalist myself, (making my own bio diesel from used cooking oil for nearly 13 years). I mention this to illustrate that I am open minded, I love the Hudson River and want to do nothing to it to harm it. I am one of the many responsible caretakers of the river that makes a portion of my living upon the river. I do not want to see anything

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happen to it.

My greater fear is that someone will transit above Kingston in an instance of poor visibility, or in the ice season during hours of darkness because anchoring, and waiting for conditions to improve was not an option, then while piloting in those less than favorable conditions, the vessel will have a problem that may include a grounding, allusion or collision. If anyone really cares about the safety and health of the river, they would want designated anchorage areas for mariners to use when necessary.

If I try to understand what the honest objections to regulated anchorage areas upon the Hudson River are, or what would really and truly motivate someone to oppose the establishment of official anchorages, (where “unofficial anchorages” have existed for decades).... I do believe it is solely because some individuals who live along the river or enjoy the views of the river, (as we all do) feel that seeing barges or commercial vessels anchored in the river may somehow obstruct or diminish their view. Again it is worth noting, these “unofficial anchorages” have existed for decades. I do not know of any individuals living along the river who have lived on the river longer than vessels have been anchoring in areas off Port Ewen, Rhinebeck, or even Yonkers.

The Hudson River is a significant waterborne commerce highway facilitating exports and imports of vital cargo to the citizens of the United States of America and especially the residents of New York State. The propose anchorages are critical to vessel safety and if not approved will compromise navigation safety and our national economy.

The proposed federally designated anchorages have long served as custom and practice anchorages and now need to be federally designated anchorages protecting navigation safety when/if vessels must anchor unexpectedly in diminishing weather/visibility, during emergencies, and/or during the winter months when mariners navigate the Hudson River predominately during day light hours and MUST anchor in the Kingston Advancing these custom and practice anchorages to Federally Designated Anchorages will preserve these strategically sited anchorages that are critical to navigation safety and trade.

Respectfully,

Stephen A. Richter

Captain Stephen A. Richter
Pilot and Docking Pilot

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