



27 August 2016

Docket Number USCG-2016-0132  
Anchorage Grounds, Hudson River; Yonkers, NY to Kingston, NY, with Specific Comments  
Related to Kingston Flats South Anchorage.

US Coast Guard:

My name is Robert S. Wills, and I am the Vice Commodore of the Hudson River Ice Yacht Club (HRIYC), first established in 1885 by John Aspinwall Roosevelt, Uncle of the 32<sup>nd</sup> President of the United States of America. I am writing to first thank the USCG for the most accommodating relationship our two organizations have had over the years, as your Cutter Crews have both protected winter shipping on the Hudson River while simultaneously protecting the winter ice sheet upon which we have been plying our sport since the Dutch brought it here in the 1600's. This photo, taken in 2011, shows CGC107, Penobscot Bay and Orion (c. 1906, Saugerties) at Rhinecliff, directly at what would be the entrance to the proposed Kingston Flats South Anchorage:



Secondly, I am writing to establish in the Federal Record the HRIYC's interests in the Hudson River, and to describe how we would be severely and negatively impacted by the proposed

ruling.

Third, as an architect specializing in historic restoration, I wish to emphasize the location of the Kingston Flats South anchorage is entirely within the largest historic district in the nation, the Hudson River National Historic Landmark District. As such, in my opinion and the opinion of John Winthrop Aldrich, former Deputy Commissioner of New York State Office of Parks, Recreation, and Historic Preservation, the USCG will be required to complete a Section 106 review of this federal action, under the provisions of the 1966 National Historic Preservation Act.

Fourth, I would like to include in the record recent articles on the oil economy, specifically how the oil industry uses the financial technique of CONTANGO, how temporal in nature it is, and how, in my opinion, basing a permanent designation on a temporal phenomenon is inappropriate.

### **History of Ice Yachting and the Hudson River Ice Yacht Club**

The Dutch brought what was then a practical application of travel over ice to the Hudson Valley in the 1600's, by attaching runners (ice skates) to the bottoms of their hulled ships, to allow commerce in winter. In 1812, an article appears in an Albany newspaper about an iceboat "carrying passengers and sheep from Athens Landing to Albany". In the War of 1812, Robert Fulton supposedly had a scheme to blow up British ships in Lake Champlain using an ice boat laden with explosives. And Franklin Delano Roosevelt suggested to the Mayor of Albany, Erastus Corning, that the Hudson Ice will never be broken by ice breakers for commerce (to get to the munitions being manufactured at the Watervliet Arsenal). (That is, until the outbreak of World War II...and we are hardly in a war right now.)

In the later 1800's, people realized how fast these craft traveled. A practical need became a sport. Refined yearly by the mariners of the Hudson River and the gentry of the Valley, these craft took on a very different look, and became the fastest vehicle on earth, documented in articles which described races between New York Central's Empire Limited and ice yachts, with the ice yachts winning. Poughkeepsie, then Hyde Park, and now points north (Rhinecliff, Barrytown, Germantown, and Athens) are both historic centers of ice yacht sailing, and where we have recently sailed.

HRIYC incorporation papers state that the objective of our club is the "Preservation and Promotion of Ice Yachting in the Hudson Valley". We currently have approximately 40 ice yachts from the 1800's and early 1900's restored and ready to sail, the oldest being **Mary Ellen** from 1857. Approximately 20 others are in need of restoration. We are noted authorities on the history, construction, and restoration of these fine craft, as evidenced by our selection by the National Park Service to restore Franklin Roosevelt's own ice yacht, **HAWK**. Attached is the announcement for the display of ice yachts we mounted for the National Park Service to celebrate the Hudson-Fulton-Champlain Quad-centennial in 2008. The photo you see was taken in 2007, directly in what is proposed to become the Kingston Flats South Anchorage:

## ICE YACHTS OF THE HUDSON: A Dutch Winter Tradition



### ICE YACHT DISPLAY

The Roosevelt Library Lawn  
Franklin D. Roosevelt Presidential Library and Home  
December 27th, 28th, 29th, 30th, 31st, 2008, January 2nd, 3rd, 2009

The Dutch brought ice sailing to the Hudson River Valley.  
Until the invention of the automobile, ice yachts were the fastest vehicles on Earth  
and attracted many rich and famous sailors – including the Roosevelts.

[www.HistoricHydePark.org](http://www.HistoricHydePark.org)

Sponsored by:  
Hudson River Ice Yacht Club  
Franklin D. Roosevelt Presidential Library and Museum  
Roosevelt-Vanderbilt National Historic Sites  
Hudson River Maritime Museum  
Hudson River Valley National Heritage Area  
Dutchess County

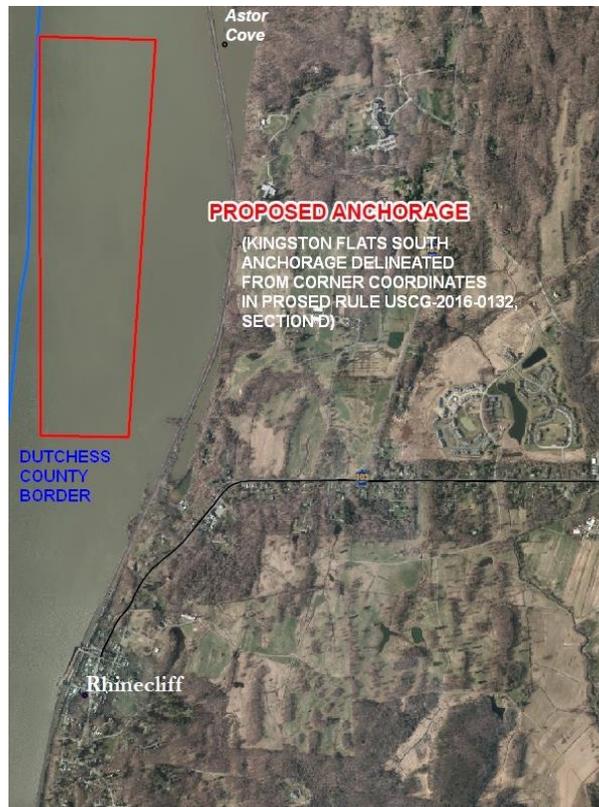


## Current Sailing Conditions

Climate change, as locally manifested in the Hudson River Valley, has been 'good' to us. The old rule amongst ice boaters was that once in ten years would we get onto the main stem of the river – otherwise, we were relegated to Tivoli South Bay (not a bad experience). However, in the last decade, we have had very favorable conditions; in fact, we have been able to sail from the Rhinecliff Dock three of those years, on the Hudson three other years, and on Tivoli Bay twice. Only twice have we been “shut out”, with no sailing whatsoever (2016, with warm conditions, and 2015, with too much snow and broken ice). Most emphatically, I wish to state that ours is not a dead sport, but one we regularly and enthusiastically participate in on the Hudson River!

## Significance of Rhinecliff

The Rhinecliff Dock is the only public access to the Hudson from which we can launch ice yachts, and which the public can access the ice sheet, all the way north to Tivoli and Germantown Landing. It is also the spot that allows our ice sheet to form for miles to the north. The reason is that this is where the shipping channel transitions from near the east shore to the west side. In addition, the natural terrain of the Dutchess County shore at this point forms a barrier to ice movement, where the Town of Rhinebeck (and the Hamlet of Rhinecliff) juts into the Hudson. This impediment is what creates our ice, and which, if allowed to be broken for the proposed anchorage, would make it far less likely that we would have any sailable ice (smooth and at least 8” thick) as far north as Tivoli Bays. THE ESTABLISHMENT OF THE ANCHORAGE WOULD DESTROY THE ONLY PLACE WE CAN NOW PRACTICE OUR SPORT AS IT WAS ORIGINALLY PRACTICED.



In closing, the history of the Hudson River Valley should never be compromised, especially as a result of the vagaries of the world oil market. Although I respect all of the Hudson River Mariners that have responded favorably to this Proposal, it sickens me to think that its genesis has nothing to do with safety, but is a direct result of the oil industry trying to maximize their profits by floating oil “out” of their inventories through a technique called CONTANGO:

<http://www.bloomberg.com/news/articles/2016-08-04/oil-traders-see-glimmer-of-profit-ahead-in-storing-crude-at-sea>

We cannot allow the Hudson River to be put at risk by becoming a floating tank farm, all for the sake of a greasy buck!

In fact, in an even more recent article describing stabilizing and increasing oil prices, the author states that inventories are going down, and CONTANGO is becoming less important as oil prices rise. In essence, oil is expensive enough to once again sell. So, it is likely we may see a reduction in the need for Hudson River anchorages.

<http://www.bloomberg.com/news/articles/2016-08-25/look-past-opee-freeze-hype-to-really-understand-oil-s-advance>

Certainly, permanent anchorages which destroy our history, and have the potential to do significant environmental damage (should the unexpected occur), established simply to satisfy a temporary industry-specific fiscal problem, are **most inappropriate**.

For the members of the Hudson River Ice Yacht Club, and all those members of the public who appreciate our sport, I urge the USCG to abandon this proposal.



2014, Barrytown

Sincerely,

A handwritten signature in black ink, appearing to read 'RSWills'.

Robert S. Wills, RA  
Vice-Commodore  
Hudson River Ice Yacht Club  
PO Box 203