

RE: Docket USCG-2016-0132 Hudson River Anchorages

Greetings:

Thank you for the opportunity to comment on the proposal to authorize ten anchorages with 43 new berths on the Hudson River.

Request

I request that:

1. The Coast Guard reject the request for these new anchorages on the basis that the new anchorages
 - are unnecessary for navigational safety and actually reduce safety,
 - pose substantial and probable risk to Hudson Valley residents,
 - pose substantial and probably risk to the fragile Hudson Valley ecosystem, and
 - threaten the economy and well-being of many of the communities in the Hudson Valley, or
2. In the alternative, hold public hearings that include the participation of NOAA, the EPA, FEMA and the NYS DEC. in order to assess fully the various risks to navigation, the environment, and the health and welfare of the local population.
3. Should any additional anchorages be granted, these should not be located in the Kingston Hub or other areas where the environment and the local economies are most threatened and response and recovery resources are inadequate.

Background

I am a resident of the Town of Rhinebeck living approximately a mile from the Hudson River having retired here from the Metro Detroit area where I lived within a few miles of Detroit River and Lake St. Clair waterways that are busy with domestic and international shipping, which I enjoyed watching from Belle Isle. The Mid-Hudson Valley where I live now has a mixed economy which increasingly depends on tourism (a \$4 to \$7 billion dollar industry), weekenders with second homes, retirees and farming including organic and farm to table operations. It has been designated a National Heritage Area. The river provides drinking water for 9 million people including approximately 102,000 people in my local area. The Hudson River tidal estuary supports more than 200 species of fish including endangered species as well as 40 state designated wildlife habitats. The Hudson River is one of two principal spawning grounds in the Eastern US for shad, sturgeon, herring, alewives, blue crab, mackerel, menhaden and striped bass. Some of these are already in decline.

Safe Navigation

Contrary to the claims of advocates for additional anchorages, the requested additional anchorages would not enhance the safety of navigation, and would increase risk.

- The Coast Guard is in the best position to determine when additional temporary berths are needed as was the case during Hurricane Sandy; this system has worked well.
- There is no documented evidence of requests for emergency anchorage under a wide range of weather conditions at current levels of traffic that occur throughout the year that would justify granting any additional anchorages.

- Since southbound oil barges have routinely sailed at night, there is no reason to conclude that northbound barges cannot sail at night as asserted by the parties requesting additional anchorages.
- The fact that the barge operators began anchoring in the Kingston Hub without authorization suggests strongly that they require close supervision by the Coast Guard.
- The safety rationale put forth by industry in requesting additional anchorage is also called into question by the fact that a surplus of domestically crude oil is now being stored on barges in the Gulf of Mexico in anticipation of legal clearance to sell crude oil in foreign markets. The industry request for long term anchorage is more consistent with the desire for storage capacity than safety.

Response and Recovery

Resources for response and recovery on the Hudson River are inadequate.

- Spills of crude oil on the Hudson River are probable if not inevitable: there has been one spill a year in the eastern US on rivers in the last three years, and in December of 2012 the tanker Stena Primorsk carrying 12 Million gallons of crude oil had a close call when it ran aground on the Hudson River near Albany breaching its outer hull.
- The thorough Coast Guard Geo Response Plan for prestaging resources along the Hudson River has not been fully funded.
- When a tug hit a crane at the Tappan Zee Bridge, it took 30 hours to respond. Great harm to the Pierpont Marsh was probably avoided due only to calm conditions. Crude oil spills require a much faster response.
- Industry representatives have indicated that response and recovery is largely a responsibility of local communities. In my community, the Town of Rhinebeck, there are two fire districts located on the shore of the river, and both are volunteer fire departments. The Hillside Volunteer Fire Department has six (6) fire officers, approximately twenty-two (22) members and three (3) vehicles. The Rhinecliff Volunteer Fire and Rescue located in the Hamlet of Rhinecliff has seven (7) line officers and three (4) fire vehicles and approximately fifty (50) volunteers. Volunteer members have various levels of training and experience.
- Determining the adequacy and readiness of available resources as well as sustainability of funding for every risk scenario is essential before authorizing additional anchorages.

Environmental Risks

The risk to the environment is substantial and probable.

- The recovery rate for heavy crude is only 5%.
- The turbidity, tides and currents in the Hudson River render containment and recovery of spills particularly difficult.
- After the Lac-Megantic oil train explosion in Quebec in July 2013, 50% destruction of the fish stock in a nearby waterway was found. A 50% destruction rate for the more than 200 species of fish including endangered species in the Hudson as well as irreparable damage to one of only two principal spawning grounds in the Eastern US for shad, sturgeon, herring, alewives, blue crab, mackerel, menhaden and striped bass would be an unmitigated ecological disaster.
- NOAA has found that large circles of habitat disruption occur where anchors are dropped.

Health Risks

The proposed anchorages pose a substantial risk to the drinking water of the local population among other hazards such as air pollution and explosions.

1. After a spill the remaining 95% of crude following recovery would pose an unacceptable risk of contaminating the drinking water of the 102,000 people living in my local area as well as the 9 Million or so who rely on the Hudson River for drinking water.
2. Bakken crude is highly flammable; an explosion such as the one that occurred at Lac-Megantic would be devastating.
3. The diesel generators running on anchored barges would create an air pollution hazard.

Economic Risks

The economy of the Mid-Hudson Valley where I live is particularly vulnerable to an adverse incident in a manner that would be disproportionate to the actual damage caused by the incident, and the routine pollution generated by anchored barges would be a deterrent to economic development.

1. Tourism, second home ownership, organic farming, farm to table operations, and retirement are significant and growing elements of the Mid-Hudson economy.
2. Even one widely reported incident would give rise to the idea that the Mid-Hudson Valley's environment is hazardous or becoming industrialized. Such an incident would be devastating to economic activity that depends on the pristine rural nature of the area.
3. The presence of anchored crude oil barges is noxious and intrusive: Barge lighting is similar to the lighting emitted by refineries and chemical plants, and the onboard generators produce both noise and diesel fumes. The presence of these floating industrial sites on the river would undoubtedly undercut the residential market and tourist business resulting in a reduction in the tax base for local communities.

Concluding Comment

I spent most of my life living near a waterway with frequent commercial vessel traffic. I grew up in the City of Detroit, located on the shore of the Detroit River, and I spent the last twenty-eight years before coming to the Hudson Valley living in Grosse Point Park where the waters of Lake St. Clair flow into the Detroit River. The beautiful waterfront is one of the community's main attractions, and the communities on both the US and Canadian shore depend on the beauty and recreational opportunities offered by the lake and the river. Passing freighters were actually an attraction. As one moves down river toward Southwest Detroit the river becomes industrialized characterized by refinery and other intrusive 24-hour industrial lighting, air and water pollution as well as industrial noise. This proposal threatens to turn the Mid-Hudson Valley into Southwest Detroit but with the industrial activity on the river instead of on the land and with greater risks to safe navigation, to a healthy ecosystem, to the health of the community and without even the benefit of providing employment to the exposed population. The proposal for additional anchorages would use the river not for navigation but for industrial activity conducted on the river. Given the probable risks to navigation, the environment, health and the local economy, either the proposed additional anchorages should be rejected out of hand or hearings should be held with the participation of NOAA, the EPA, FEMA and the NYS DEC.

Thank you

David J. Weiner
306 Ackert Hook Rd
Rhinebeck, NY 12572
313-433-6409
weinerdj@aol.com