Robert P. Astorino  
County Executive  
Soil and Water Conservation District  

Jan Blaire  
Chair  

August 26, 2016  

Steven D. Poulin, Rear Admiral  
Commander, First Coast Guard District  
U.S. Coast Guard  
408 Atlantic Avenue  
Boston, MA 02110  

RE: PROPOSED RULE: ANCHORAGE GROUNDS, HUDSON RIVER, YONKERS, NY TO KINGSTON, NY; DOCKET IDENTIFICATION NUMBER: USCG-2016-0132  

Dear Commander Poulin:  

In regard to the proposed rule “Anchorage Grounds, Hudson River; Yonkers, NY to Kingston, NY, “ Docket Identification Number: USCG-2016-0132, the Board of Directors of the Westchester County (NY) Soil and Water Conservation District unanimously approved the attached resolution calling on the Coast Guard to reject the proposed rule until a comprehensive environmental review of the proposal has been properly conducted.  

The proposed rule could cause significant and long-term adverse environmental impacts to the Hudson River channel, including its bed and banks, and the river’s associated natural resources and waterfront. These impacts must be fully identified and addressed in a comprehensive environmental impact statement in accordance with federal guidelines, policies, regulations and laws.  

In a July 29, 2016 letter to Craig Lapiejko, of the Waterways Management Branch, First Coast Guard District, Westchester County Executive Robert P. Astorino wrote, “Of primary concern is the potential use of the proposed anchorage sites by vessels carrying crude oil, petroleum and chemical products and other materials that, should they leak or spill into the river, would cause pollution and negatively impact the river’s ecosystem.”  

The Board of Directors fully supports County Executive Astorino and other municipal and state representatives, not-for-profit organizations and many other interested parties in calling
for a comprehensive environmental review of this significant and potentially dangerous proposal.

Thank you for your consideration of the Board’s comments and resolution.

Sincerely,

Jan Blaire,
Chair

JB/RD

Via Email:

cc: Hon. Robert P. Astorino, Westcheter County Executive
Westchester County Board of Legislators
Board of Directors, Westchester County SWCD
Kevin Plunkett, Deputy County Executive
George Oros, Chief of Staff
Eileen Mildenberger, Chief Advisor to the County Executive
Edward Buroughs, Commissioner, Department of Planning
Robert Doscher, SWCD District Manager
Craig Lapiejko, Waterways Management Branch, Coast Guard First District
Michael Latham, Director, New York State Soil and Water Conservation Committee
Lower Hudson River Coalition of Conservation Districts
RESOLUTION
1-2016

RESOLUTION OF THE BOARD OF DIRECTORS OF THE WESTCHESTER COUNTY SOIL AND WATER CONSERVATION DISTRICT URGING THE UNITED STATES COAST GUARD TO REJECT PROPOSED RULE USCG-2016-0132 IN RELATION TO HUDSON RIVER ANCHORAGE GROUNDS

WHEREAS, under title 33 Code of Federal Regulation (CFR) 109.05, U.S. Coast Guard District Commanders are delegated the authority to establish anchorage grounds by the Commandant of the U.S. Coast Guard; and

WHEREAS, in proposed rule USCG-2016-0132, the Coast Guard is considering establishing new anchorage grounds in the Hudson River from Yonkers, New York, to Kingston, New York; and

WHEREAS, the Coast Guard is currently accepting public comment on the proposed rule; and

WHEREAS, the Coast Guard is contemplating anchorage grounds in Tomkins Cove that would cover approximately 98 acres for up to three vessels for long term usage; and

WHEREAS, the Coast Guard is further contemplating a Montrose Point Anchorage Ground that would cover approximately 127 acres for up to three for long term usage; and

WHEREAS, the Coast Guard is also contemplating a Yonkers Extension Anchorage Ground that would cover approximately 715 acres for up to 16 vessels with a draft of less than 35 feet for long-term usage; and

WHEREAS, the environmental concerns brought forth by this proposal vary at each anchorage point and have not been fully studied by the scientific community; and

WHEREAS, the long-term mooring points established under this rule would create sediment disturbances and pose new and potentially catastrophic environmental risks from collisions and unmitigated oil spills; and

WHEREAS, two endangered species, the shortnose and Atlantic sturgeon winter at Montrose Point; “scarring” of the riverbed caused by the use of anchors, anchorage chains and pile
moorings may negatively impact the sturgeon population and further fish and aquatic wildlife habitat, presenting a threat to biodiversity; and

WHEREAS, the permanent impact upon soil, water and ecological issues in the communities of Westchester County along the Hudson River estuary are major concerns that deserve a full environmental impact study and risk assessment;

NOW, THEREFORE, BE IT RESOLVED, that the Board of Directors of the Westchester County Soil and Water Conservation District pauses in its deliberations to urge the United States Coast Guard to reject proposed rule USCG-2016-0132 as drafted; and

BE IT FURTHER RESOLVED, that this Board of Directors further pauses in its deliberations to urge the United States Coast Guard to conduct a full environmental impact study and risk assessment for this proposal in accordance with the applicable federal environmental guidelines, policies, regulations and laws; and

BE IT FURTHER RESOLVED, that this Board of Directors calls upon all residents of Westchester County to submit public comment on this proposal at regulations.gov by the September 7, 2016 deadline for public comment; and

BE IT FURTHER RESOLVED, that the District Manager of the Westchester County Soil and Water Conservation District or his or her designee is hereby authorized and directed to submit a copy of this resolution to the docket at https://www.regulations.gov/docket?D=USCG-2016-0132; and

BE IT FURTHER RESOLVED, that copies of this resolution, suitably engrossed, be transmitted to the Rear Admiral Linda L. Fagan, Commander, First Coast Guard District, United States Coast Guard; Michael Latham, Director of the New York State Soil and Water Conservation Committee; Westchester County Executive Robert P. Astorino; Westchester County Legislator Michael Kaplowitz, Chairman of the Board of Legislators; and County Legislator Francis Corcoran, Chairman of the Westchester County Board of Legislators Committee on Environment and Health.

ADOPTED 6 – 0

AYES

ARNOLD, Christopher R.
BLAIRE, Jan (Chair)
CARPENTER, Susan
REYES-GUERRA, Sandra
SENATORE, Peter
SINGER, Terry

NAYS

None