



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, Westchester County Executive  
Westchester County Board of Legislators  
Board of Directors, Westchester County SWCD  
Kevin Plunkett, Deputy County Executive  
George Oros, Chief of Staff  
Eileen Mildenerger, 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](http://www.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