



HRBYCA, Inc.
P.O. Box 266
Ossining, NY 10562

August 26, 2016

Agency: Coast Guard (USCG)

Parent Agency: Department of Homeland Security (DHS)

Re: Docket ID: USCG-2016-0132; Anchorage Grounds: Hudson River, NY

To Whom It May Concern:

The Hudson River Boat and Yacht Club Association (HRBYCA), representing thirty one (31) boat clubs and three thousand (3000) individual members on the Hudson River, is strongly opposed to the U.S. Coast Guard (USCG) proposal to put barge anchorage sites along the Hudson River. We request that the Coast Guard hold public hearings so that all factors are considered before any commitment is made regarding such anchorage sites. We also request that a complete environmental review be conducted to explore any potential negative impact on the ecosystem and native wildlife.

HRBYCA considers the proposal for these anchorages as seriously flawed. While the oil companies may benefit greatly from using the Hudson River as a parking lot, most others will surely see overwhelming disadvantages. The Hudson River and the public are the losers. Let us examine why.

All of the boat clubs in HRBYCA are opposed to this proposal. Letters opposed to it, with specific objections, have been sent to the USCG from New Hamburg Yacht Club, Chelsea Yacht Club and Minisceongo Yacht Club. Individual HRBYCA members have also expressed their concerns. New Hamburg Yacht Club is especially worried about water contamination, boater safety, noise, air and light pollution. Chelsea Yacht Club is concerned about the dangers posed by the anchorage interfering with their mooring fields - which New York State authorizes through a Submerged Land License. The proposed anchorage would also obstruct their racing course and impede the safety of their boats. Minisceongo Yacht Club has many environmental, safety and recreational boater interference concerns. Their letters speak to the details.

In addition, our association has received letters from Peekskill, Hook Mountain and Yonkers Yacht Clubs expressing similar apprehensions. Many others have been vocal at our meetings about how this proposal would, without a careful consideration of the damage that could be done, reverse all of the progress made over the years to have the Hudson River keep its designation as a National Heritage River.

From the public record, the Hudson River Estuary Action Agenda published by the NYS DEC and formulated by the Hudson River Estuary Management Advisory Committee (HREMAC) cites six (6) major benefits of a strong and vibrant Hudson River ecosystem. It strives to achieve those benefits through action plans. Those benefits are:

- Clean water
- Resilient communities
- Vital estuary eco-system
- Estuary fish, wildlife and habitats
- Natural scenery
- Education, river access, recreation and inspiration

HREMAC has worked hard to achieve these goals over time. None of them is advanced by this USCG proposal and most of them are negated or harmed by it. The consequences could be catastrophic. For clean water, this proposal would seriously open up the risks of spills and pollution. For resilient communities, it would bring in noise, light and air pollution. For vital estuary eco-system protection, it would disturb the submerged aquatic vegetation beds (SAV) so essential for a balanced and clean river. For estuary fish, wildlife and habitats, the anchorages are in the spawning grounds of Atlantic sturgeon; they would scar the river bottom and destroy underwater vegetation. For natural scenery, it would turn the river into a barge parking lot. For education, river access, recreation and inspiration, the anchorages would negate all of the progress that HREMAC has achieved over the years.

Also from the public record, Riverkeeper - a strong Hudson River advocacy voice - has expressed serious doubts about this proposal. (Letter from Pace Environmental Litigation Clinic, Inc., to Mr. Craig Lapiejko dated June 30, 2016)

Another public record organization urging careful consideration of these anchorages is BoatUS. The size of the anchorages and their swing areas will, at times, take up half the width of the River. Careful study of this proposal should consider recreational boaters' needs and not just commercial interests.

In the Poughkeepsie Journal dated August 15, 2016, a letter to the editor from Jane Heidgerd Garrick talks about Contango and how these anchorages are affecting waterways all across the globe to the benefit of the oil companies and the detriment of nature and the greater public good. The Journal also had an editorial on 8/24/2016 entitled "Coast Guard's anchorage plan is unacceptable."

Many River communities like Beacon, Marlboro, Fishkill and Newburgh have passed resolutions against this proposal. More are considering similar actions. Local politicians like Assemblyman Frank Skartados have held news conferences where the mayors or supervisors of Poughkeepsie, Newburgh, Beacon, Marlboro and Lloyd spoke against it. Also speaking at this press event were Clearwater, Scenic Hudson and Riverkeeper. Some of their concerns included the safety of the water supply that services over one hundred thousand (100,000) people. Historic Hudson River Towns is preparing a letter to the USCG expressing their objections. They are an advocacy group helping lower Hudson River towns and cities improve their riverfronts and local environments.

These public and private concerns are very important and deserve thorough consideration. Again, we urge the USCG to hold accessible public hearings so that they may hear for themselves what this proposal will do to our magnificent National Heritage Hudson River. We also respectfully request that a thorough environmental review be conducted to ensure that we do not undo all of the progress made in recent years to make the Hudson the public asset and jewel it is today.

Thank you for your consideration,

Jerry Silverman, President Hudson River Boat and Yacht Club Association

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