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August 12, 2016

Mr. Craig Lapienko
Waterways Management Branch
United States Coast Guard (USCG)
Department of Homeland Security (DHS)

Submitted Electronically

RE: Anchorage Grounds: Hudson River, NY
Docket ID USCG-2016-0132-0001

The Town of Cortlandt is writing to express our serious concerns with the proposed new anchorage sites in the Hudson River and to make **a second request to hold public hearings within the Town of Cortlandt** for the proposed anchorage sites that would be located near our community in Montrose Point (Montrose Point anchorage site) and Verplanck/Buchanan (Tompkins Cove anchorage site). We have the following comments and questions:

1. The Hudson Estuary is one of the most significant estuarine habitats in the United States and contains a dynamic rich habitat with high biodiversity. There are a number of threatened and endangered species that utilize the Hudson River for habitat including Atlantic Sturgeon. The anchoring of vessels along the Hudson will disturb and damage animals and plants on the bottom of the River by increasing suspended sediments from the disturbance of the bottom or through direct contact with dragging anchors.
2. The existence of anchorage areas close to wildlife habitats such as those that exist near Montrose Point including the Hudson River itself as well as George's Island, Oscawana Island, Brinton Brook Sanctuary, and Montrose Point State Forest, can also cause disturbance to habitat through noise, nighttime lighting, and/or wave action. The Montrose Point anchorage site is located within an area of moderate wave action as identified by FEMA (FIRM Maps Panel G Version 2.2.2.1 dated December 2014). In these locations waves greater than 1.5 feet can result in additional impacts to the shoreline, which could be exacerbated by the movement of barges. What is the typical wave height generated by the movement of the barges proposed to be located at these anchorage sites?

3. Within the estuary, habitat disturbance and alteration from navigation dredging and petroleum or other hazardous material spills pose potential threats to fish spawning and the estuary ecosystem. Over the years, the Town has made numerous applications for development along the Hudson River waterfront. Most recently, we submitted a joint application to USACE for a community dock at the Cortlandt Waterfront Park. The Town was required to revise our design concepts numerous times by USACE to avoid disturbance (such as shading) to the sensitive river ecosystem. The proposed anchorage locations would result in a significantly larger area of shading and disturbance. The Town would expect that similar review standards such as completion an Environmental Questionnaire and Essential Fish Habitat (EFH) Assesment Worksheet submitted to National Oceanic Atmospheric Association (NOAA) would be applied to the proposed anchorage sites to reduce impacts to the river ecosystem. Particularly, since the proposed anchorage sites are located within the same general area of the River.
4. Anchorage areas require restrictions for human safety reasons, including access, speed limits and fishing bans. This can affect the recreational use of the River since the proposed anchorage locations are directly off-shore of several existing public waterfront parks, public and private recreational areas including yacht clubs and marinas, and public and private boat launches within the Town of Cortlandt. Would the barging and movement of these vessels make existing docks and marina's susceptible to wake and/or surge damage?
5. The anchoring of vessels carrying crude oil and other hazardous materials poses a significant risk to the community since a spill of crude oil or other hazardous materials into the River could devastate the ecosystem, put people's health at risk and harm the regional economy. The Town of Cortlandt has invested decades of effort to restore the river's ecosystem as well as millions of dollars to clean up the River, improve water quality, enhance the waterfront, and improve habitat. The State of New York and the Federal government have also invested significant resources to restore the river's ecosystem and protect and preserve the River from environmental harm. The proposed anchorages are not consistent with the preservation and protection of the water quality and habitat of the Hudson River Estuary.
6. In 2014, the Town completed the Verplanck Waterfront Master Plan with grant funds provided by the New York State Department of State under the Local Waterfront Revitalization Program (LWRP). The proposed anchorage sites would not be consistent with the intent of the Waterfront Master Plan since the proposed anchorage sites would visually impact the existing and proposed recreational and tourism uses presented in the Plan. These uses include the potential establishment of bed and breakfasts along the waterfront and the use of water taxis linking the historic waterfronts of Verplanck and Stony Point.
7. The proposed anchorage of large barges at both locations would create visual impacts to the River including impacts to a portion of the Hudson River designated as a Scenic Area of Statewide Significance (SASS). In addition, the proposed anchorage sites would impact the character of the

River between Montrose Point and Tompkin's Cove. This section of the River is within the Hudson River Valley National Heritage Area. Congress designated the Hudson River Valley National Heritage Area in 1996 to recognize the national importance of the valley's history and resources. The Heritage Area is managed by the Hudson River Valley Greenway. The proposed anchorage sites would impact the aesthetic value of the landscape that this designation implies and would alter the character of the river in the proposed anchorage locations.

8. The proposed anchorage sites would be visible from Cortlandt Waterfront Park in both directions and would significantly affect the viewshed and character of Cortlandt Waterfront Park. Cortlandt Waterfront Park is a significant Town recreational resource with expansive views up and down the Hudson River. It is located at one of the narrowest points along the Hudson directly across from Stony Point State Park where Washington made his historic King's Ferry Crossing during the Revolutionary War. The Park is host to Eaglefest, the Cortlandt Community Rowing Association (CCRA), outdoor waterfront concerts and movies, Steamboat Dock, and the Veteran's Memorial.
9. The proposed anchorage sites could affect tourism and use of Cortlandt's parks and recreational resources. As described above, the proposed anchorages would be visible from the Cortlandt Waterfront Park and the segment of the Washington Rochambeau National Park Service Trail that follows the Verplanck waterfront at Kings Ferry changing the context of the viewshed and specifically the view of the Stony Point State Park. This would alter views of this historic landscape and reduce the recreational and historic character of the area. In addition, Cortlandt regularly hosts Revolutionary War reenactments in this location. These reenactments include boat crossings between Kings Ferry in Verplanck to Stony Point. The proposed anchorages would create significant visual impacts to the historic landscape in this location.
10. The proposed anchorage off Montrose Point would affect views down the Hudson River from the Westchester County owned Osawana Park and George's Island Park. These waterfront parks offer picturesque views of the historic Hudson River and contain tidal wetlands, wooded trails, and boat access to the Hudson River as well as areas for nature study and picnicking. They are also popular spots for viewing eagles on the Hudson. The proposed anchorages would impact the recreational, environmental, and cultural value of this park.
11. The Town is concerned about security related to the proposed anchorage of vessels in close proximity to the Cortlandt shoreline, Algonquin Incremental Market Pipeline (currently under construction), and the Indian Point Energy Center as well as the anticipated presence of crude oil and other hazardous materials that could be transported on the vessels and potentially released in the air and water.
12. Both the Montrose Point and Tompkin's Cove proposed anchorage locations are designated for long-term stay further exacerbating the potential for visual and environmental impacts.

13. Will aids to navigation be required to be constructed which may impact the visual characteristics of the River at night and/or restrict recreational boating?
14. Both the Montrose Point and Tompkin's Cove proposed anchorage locations are situated in relatively narrow sections of the River. This will intensify the visual impacts of the proposed sites since as well as severely restrict the recreational use of the areas.
15. The proposal does not indicate the potential need for shoreline site access for emergency access. Will shoreline access be required for the anchorage locations? Will there be access to the shore for crew members during long term dockings?
16. The Town currently has one emergency boat launch located at Cortlandt Waterfront Park. Potential emergencies such as hazardous materials spills, boat fires, and medical emergencies could occur at the anchorage sites. What will the impact (financial cost, response times, equipment needs) be to the Town's emergency providers?
17. It is unclear what regulatory approvals are needed based upon the documentation provided on the Federal Register. It is the Town's belief that the proposal should be subject to a full environmental review in accordance with SEQR and NEPA. The Town was required to complete an environmental review for the much smaller community dock project.
18. Who would have regulatory jurisdiction over the anchorage sites? It is implied that the US Coast Guard has approval authority. Would any other agencies have regulatory oversight for the creation of these Federally designated anchorages?
19. The request indicates that the proposed Montrose Point and Tompkin's Cove anchorage sites will be long term stay locations. What duration does long term imply? How long can a barge be located at a site? Is it anticipated that the sites will always be occupied?
20. How will waste management be handled for long-term docking of barges?
21. Confirm the origin of the barges. Will the barges be domestic barges only or will foreign owned barges also be anchoring in these locations?
22. Will the barges be inspected by the US Coast Guard prior to anchoring?
23. How long will it take a vessel to swing out of anchor? What is the wave action impact (wake and surge)? What is the impact to recreational users of the river?

24. Is the USCG overseeing management of the operations and docking of the barges? If not what regulatory agency will?
25. The Town recently adopted a Sustainable Comprehensive Plan. One of the four key strategies of this plan was the creation of a waterfront sustainability district along the Verplanck waterfront. This included improved public access to the waterfront as well as opportunities to increase recreational uses and tourism along the waterfront. The proposed anchorages in these locations would not be consistent with the Town's Comprehensive Plan.
26. How will the proposed anchorages affect Eagle habitat and breeding? The waterfront parks in Cortlandt are popular spots for birding and eagle viewing. The proposed anchorages could affect the use of these parks by the Eagle and the tourists that use the parks for birding and recreation.
27. Will the barges have generators that run through the night? What noise impacts will be created by these anchorages?
28. Will the barges have nighttime lighting? What nighttime lighting impacts will be created by the barges and how will nighttime lighting in these anchorage areas affect the sensitive habitat?

In summary, the Town is requesting that a full environmental review be undertaken of the proposed anchorages. The review must consider and respond to all the issues and questions presented above. In addition, the Town would like to reiterate our request for public hearings on the proposed anchorage sites to allow the Cortlandt community an opportunity to provide comments and input on the proposal.

Sincerely,

Michael Preziosi, P.E.

Michael Preziosi, P.E.
Director - Dept. of Technical Services

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