Date: September 2, 2016

To: United States Coast Guard docket #USCG-2016-0132

From: Minisceongo Yacht Club, Stony Point, NY 10980 Rockland County, Keira Burtch, Secretary

Re: Proposed Barge Anchorages on the Hudson River, Montrose Point

Use and Congestion:

Minisceongo Yacht Club is located directly west of the proposed Montrose Point barge anchorage site. Although the site is technically in Westchester County, it is also very close to several marinas, yacht clubs and public boat launch ramps on the Rockland County side. There are three channels that join the commercial marked channel from the West and one from the East:

- Stony Point Bay Channel runs through very shallow waters, serving several marinas and boat clubs with more than 430 slips.
- The Minisceongo Channel serves two marinas with at least 280 boats, 20 private slips and Panco commercial marine fuel station that also serves high speed ferries and police and fire boats.
- The Gypsum plant channel also serves Haverstraw Marina which has a busy fuel dock, pump out station and 795 slips.
- The Greens Cove Channel south of Verplank Point on the east serves 2 marinas with approximately 405 slips.
- There is an active Junior Sail Camp at Minisceongo Yacht Club and an adult Sailing School out of Haverstraw Marina.
- The Hudson River Yacht Racing Association sponsors regular races and regattas.
- There are 3 public launch ramps in the immediate area including Georges Island Park, Grassy Point and Stony Point.
- In Haverstraw there are 40 slips at the Elks club, 30 at The Harbor Condos, a Coast Guard approved recreational anchorage and high speed Haverstraw Ferry docks as well as the Tilcon barge anchorage.
- North of Croton Point on the east shore there are 3 marinas, a public ramp and a Sailing School with approximately 250 slips.
- Haverstraw Bay and vicinity, stretching from the Tappan Zee Bridge to the Bear Mountain Bridge, is the most active and congested recreational boating area on the Hudson with more than 35 Yacht Clubs, Boat Clubs, Marinas and Public Boat Ramps serving at least 3500 boats, the north end holding **almost 2000 of those slips within a mile of the proposed site.**
The immediate area surrounding the proposed Montrose site has recreational traffic perpendicular to the barge channel, branching in all directions. The underway barges would now be constricted in their maneuverability due to the proposed barge anchorage. The river narrows between Stony Point and Verplank Point to the north and Croton Point to the south and is used more like a tidal lake. This area also contains race markers used by the Hudson River Yacht Racing Association and other clubs regularly all season.

The River towns up and down the Hudson River are finally able to develop their waterfront with recreational parks and activities that draw tourists to the beautiful Hudson River Valley. We must aspire to keep the River clean and beautiful for all members of the community.

**Environmental Concerns:**

Although I understand a potential need for short term anchorage at a limited number of river locations, how many are really needed in the near future? What is the long term need for anchorages beyond Yonkers and Kingston? How long will barges be allowed to anchor at new locations, and why? What will be in the barges?

If there is an oil or fuel spill in this particular location, it will **definitely spread into the tidal wetlands** running from Stony Point Bay, behind Grassy Point along the Minisceongo Creek and Cedar Pond Brook to Haverstraw Cove in Bowline Point Park on the West. It would also threaten wetlands in Georges Park to the East, Lent Cove to Annsville Creek in Peekskill Bay and Iona Island area to the north, and Croton River wetlands to the South. In fact, these areas are all essential to many fish, bird and other wildlife species.

**Safety Issues:**

- The Haverstraw Reach (the dredged channel marked by the buoy pairs 25 - 26, and 23 - 24) is relatively narrow for barge traffic. Especially at higher tide levels, barges will often go slightly outside of the channel, into the barge mooring area, to make passage easier for themselves, or for recreational traffic. Since the proposed barge mooring area would make the entrance and adjacent areas of the Haverstraw reach much more constricted, the possibility of a collision for commercial or recreational vessels is much higher.
- The presence of anchored barges reduces maneuvering room for the many barges that traverse the area already, including those carrying large construction beams for the Tappan Zee Bridge.
- The proposed Montrose Point anchorage is located in the narrowing of the river at the north end of Haverstraw Bay, which has traffic in and out of several Marinas that converge here at the shallow entrance to Stony Point Bay. This area already has congestion and criss-crossing traffic including both power and sail boats.
- The proposed Montrose anchorage extends across the sail boat race markers and courses in Haverstraw Bay.
Questions that need to be discussed in public hearings:

- Is there really a need for more anchorages? If so, how many? What will be transported?
- What is changing in the barge industry that makes this necessary?
- What rules will apply to barges allowed anchoring in newly designated anchorages?
- What are the recreational impacts of more barge anchorages on the river towns, riverside residents and tourism?
- What are the potential impacts on fish, birds and wildlife including the additional routine discharge from barges and tugs?
- Will the corporations involved be required to post bond for any damages in the future?
- Will there be more barge terminals for loading or unloading of fuel or cargo along the Hudson River?

Thompkins Cove?

The Google map below shows the proposed anchorage corners in red, the Hudson River Yacht Racing Association (HRYRA) race markers in green and Haverstraw Marina and Minisceongo Yacht Club in orange.