

Vic Work
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September 12, 2016

Mr. Craig Lapiejko
Waterways Management Specialist
First Coast Guard District
408 Atlantic Avenue
Boston, Ma. 02110

Re: Anchoring Crude Oil Barges and Tankers in the Hudson River Towns to provide Bakken Oil to the Refineries on the East Coast

Dear Mr. Lapiejko,

I am opposed to the plan being proposed to create anchorages in the Hudson River.

I am a former US Coast Guard Licensed Deck Officer (unlimited tons any ocean license) who actually spent time working as a 2nd and 3rd Mate on Multi Cargo tankers and Chemical Ships plying the oceans, harbors and yes, even the Hudson River taking refined oil products to Albany, NY. I also studied Transportation Economics at NYU Graduate School of Business and wrote my thesis on OBO (Ore/Bulk/Oil) vessels and why they should be used for all movement of bulk cargo with vessels that have double hulls to prevent spills.

The proposal to anchor barges and tankers alongside the river towns of the Hudson River is a very bad idea and needs to be stopped. The River has been in the process of being cleaned up from a variety of pollution sources to the point at which it is used by river towns as a primary source of clean water. The River Keeper, the Clearwater, and Scenic Hudson to name a few organizations have spent time and money cleaning up the river and it needs to be protected, not threatened with unimaginable pollution threats from very heavy Bakken oil and oil products. It is bad enough that tanker car after tanker car are running down the railroads that side the river (those cars need better control and modern equipment. A good friend of mine who runs a maritime disaster clean up firm had the job of cleaning up the Bakken oil mess in Quebec from the rail car derailment that virtually destroyed a town and took two plus years to clean up.

<http://www.fool.com/investing/2016/08/13/the-5-companies-dominating-the-bakken-shale-play.aspx>

Any vessel more than 50 gross tons that plies the river should be required to have a double hull from the keel to the weather deck. That double hull should never be used for anything – a void space to prevent spills in the event of collisions or groundings. (Don't forget about the big rock under water around the curve at the USMA). The tugs pushing barges should have the same requirement and no Bakken Crude from Canada should be allowed.

This is a very bad idea and it not necessary. One part of the proposal is based on the need to allow the crews to rest – any vessel leaving NY harbor should have a vacant berth in Albany before it is allowed North of the GW Bridge. The terminals at the Port of Albany can only handle a limited number of barges and vessels at one time. The reason that there is increased traffic is that the shippers are moving heavy Bakken Crude Oil to refineries on the East Coast so that the Oil companies can make more money and profit by exporting the refined products.

Transiting day or night is not a problem as long as they remember to have up to date charts, a working depth finder and two workable radars – one large scale and one small scale with officers and crew who know how to use them. Then the only time a vessel or tug with barges should have to anchor is in terrible weather (which they should have known about and not left their safe berth in New York Harbor or Albany).

Having multiple anchorages in the river will spread the risk and put many more first responders at risk who do not have the equipment or training to handle the impending disaster that follows a collision, spill or fire. Heavy Crude will sink and pollute the bottom. Refined product will float on the surface and be a little easier to confine and clean up (given that everyone has the right training and equipment).

I am happy to testify at any hearing on this proposal. There is no excuse for putting the Hudson River and the river towns at risk for a major spill or collision and with increased traffic is not a question of whether it happens, but when.

Again, I am opposed to this plan. Our River is not for sale.

