To Whom it may concern:

For the reasons set forth herein, the Winnakee Land Trust strongly opposes the U.S. Coast Guard’s proposed plan to establish ten (10) anchorage fields in the Hudson River between Yonkers to Kingston, including fields off Kingston and Port Ewen.

Winnakee Land Trust (“WLT” or “Winnakee”) is a 501 c(3) non-profit organization incorporated in 1989 with offices at 187 E Market St, Rhinebeck, NY committed to protection and preservation of the natural, agricultural, cultural, scenic, historical, and open space resources of northern Dutchess County, including farmland, viewsheds, wetlands, habitats and undisturbed natural areas.

As an accredited land trust, Winnakee not only protects farmland and natural habitats from development, but provides public recreational opportunities through its two parks—Drayton Grant Park at Burger Hill in Rhinebeck and Winnakee Nature Preserve in Hyde Park. We also have established miles of public access trails with a focus on locating them along the Hudson River corridor. Winnakee continues to work on expanding these trails in order to connect to trail networks leading to New York City to the south and Albany to the north. We host several events a year that educate the communities we serve about the importance of natural resource protection. We love to bring our communities together to enjoy the landscape we share.

Winnakee believes in smart growth. Balancing land protection with appropriate development will ensure that our communities continue to have all the resources they need for generations to come. We are happy to work with local planners toward protecting land of high conservation value while providing for smart, sensitive development.

A plan first proposed in January 2016 by the Maritime Association of the Port of New York and New Jersey's Tug and Barge Committee in a letter to the Coast Guard, proposed 10 anchorage fields in the Hudson River between Yonkers to Kingston, including fields off Kingston and Port Ewen. If approved, the anchorages, totaling more than 2,400 acres, would allow for storage of up to 43 articulated barges carrying Bakken oil between Albany and New York Harbor. Nine of the 10 anchorages are proposed to be long-term use. In essence, these are

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huge parking lots for barges, many of which likely would contain volatile crude oil awaiting shipment to East Coast refineries.

The shipping industry claims the anchorages are necessary so the millions of tons of cargo shipped up and down the Hudson can be transported safely, allowing ships to avoid traveling in low-visibility or low-tide situations. For the most part, the cargo is comprised of petroleum products. The industry says further that the volume of barge traffic is likely to grow with Congress lifting the ban on crude oil exports.

Among the proposed sites are:

- A Kingston Flats South Anchorage Ground off properties that were once part of the historic Astor estate and just south of a National Estuarine Research Reserve at Tivoli Bays, which would cover about 280 acres for up to three vessels with a draft of less than 22 feet for long-term usage. It would provide a vessel swing circles of about 1,300 feet for one vessel and about 1,800 feet for two vessels.

- A Port Ewen anchorage ground off Rhinecliff public dock and near the entrance to Kingston’s Riverport, which would cover about 50 acres for one vessel with a draft of less than 30 feet for short-term usage. It would provide a vessel swing circles of about 1,200 feet.

- A Port Ewen anchorage ground off Big Road Point across from Sturgeon Point in Rhinecliff, which would cover about 207 acres for four vessels with a draft of less than 35 feet for long-term storage. Each of the four vessel swing circles would be about 1,200 feet.

Drafted by the WLT Easement Committee, and adopted by its Board of Directors in 2011, WLT adopted a Strategic Conservation Plan (the Plan). The Plan sets forth a multilayered analysis of the conservation values in the northern Dutchess County landscape that clearly outlines Winnakee’s conservation priorities and takes in a broad range of criteria that evaluate natural, agricultural, and scenic values and uses GIS-based mapping and filtering to highlight lands that have the highest value for conservation.

The Hudson River serves as a focal point for the conservation priorities outlined in the Plan because of its natural beauty and the opportunities that it presents for recreational use. The Plan recognizes the significant impact the River has on the region’s scenic splendor. Furthermore, it encourages the revitalization of community riverfronts providing river access and other amenities for the enjoyment of all. It also notes that many of properties currently under easement, or those that are identified as having significant conservation value, either front on the Hudson River in the vicinity of these anchorages or have the proposed anchorage sites in their viewsheds with the Catskill Mountains as backdrop.

If approved, these anchorages would undermine longstanding efforts that our northern Dutchess communities have made to clean up the river. In addition to posing a significant environmental risk—what one opponent has called “a disaster waiting to happen”—the proposed anchorages

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could jeopardize the great strides communities have made in revitalizing their riverfronts. They also would imperil the region’s scenic splendor and adversely impact some of the scenic resources so highly valued by Winnakee and its supporters that we have worked so hard to protect.

Moreover, Winnakee also opposes efforts that would significantly increase the movement of dangerous tar sands oil on the river. One accident or spill could easily cause catastrophic environmental damage and turn the clock back decades in the progress that has been made in improving the river’s environmental condition. We also oppose turning one of the Nation’s more important and scenic rivers into a parking lot for crude oil vessels. The U.S. Coast Guard’s proposal for the anchoring sites has prompted a groundswell of criticism from the communities along the river. Our pristine Hudson River could be turned into a floating fuel pipeline is strictly a financially driven agenda without any concern for the quality of life and the concerns of our river communities.

Since coming to public attention in late June, the proposal has generated vigorous and virtually unanimous opposition from riverfront communities. Recent criticism also has come from U.S. Sens. Charles Schumer and Kirsten Gillibrand, U.S. Rep. Sean Patrick Maloney, Ulster County Executive Michael Hein, Dutchess County Executive Marc Molinaro, the Kingston Sailing Club, Hudson Riverkeeper and Dutchess County Legislator Joel Tyner, Scenic Hudson, Clearwater, and others.

Currently, the rules page on regulations.gov has more than 3,000 comments as of early October. The Coast Guard said it would review those comments before potentially refining the rule ahead of public hearings early next year. The Coast Guard has said it plans to hold public hearings in the spring. Any new rule would go into effect in early 2018.

Based on the significant impact the Anchorage proposal will have on the spirit and intent of the Winnakee Land Trust Mission and on behalf of the Winnakee Land Trust, its Board of Directors, staff, volunteers and members as well as residents and property owners residing in proximity to the affected areas of the Hudson River and those impacted by any detrimental impacts on our Mid-Hudson viewsheds, we strongly oppose the establishment of these long term anchorages and trust that full consideration will be given to the impacts on the Mid-Hudson region.

Sincerely,

Saveria L. Mazzarella
President
On behalf of the Board of Directors

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