



Kingston Conservation Advisory Council
420 Broadway
Kingston, NY 12401
(845) 481-7339

October 5, 2016

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

Dr. Mr. Lapiejko,

The City of Kingston Conservation Advisory Council would like to express our opposition to the proposed barge anchorage sites on the Hudson River per Docket Number USCG-2016-0132.

The mission of the Kingston Conservation Advisory Council is to ensure the conservation of the City of Kingston's natural resources and the enhancement and protection of its environment while fostering unified action on environmental matters.

The concerns of the Kingston Conservation Advisory Council regarding this rule change include the Kingston Hub made up of long term berths at Kingston Flats South (3) and Big Rock Point (4) and one short term berth at Port Ewen. Long and short term do not appear to be defined.

The Maritime Association of the Port of New York/New Jersey Tug and Barge Committee refers to an anticipated increase in oil shipping on the Hudson River implying that most of the barges and ships will be carrying petroleum products. The Kingston CAC is aware of its coastal natural resources and habitats based on the work of the Conservation Advisory Council and other planning documents including, but not limited to, "Rondout Harbor Management Plan" and a "Habitat Summary" completed in 2014 by staff at NYSDEC Hudson River Estuary Program which maps out and describes the Significant Coastal Fish and Wildlife Habitat in the vicinity.

The City of Kingston is a Bronze Certified Climate Smart Community, the highest level currently achieved in the state, has completed a Climate Action Plan in 2012 and recognizes that greenhouse gas (GHG) emissions from human activity are catalyzing profound changes in climate and weather, the consequences of which pose substantial risks to the future health, well-being, and prosperity of our community. The City of Kingston has committed to reducing GHG emissions and does not want to prop up the fossil fuel industry by allowing long-term anchorage of petroleum bearing vessels.

The proposed anchorage Kingston Flats South, is in the vicinity of the Flats (along the middle of the Hudson and centered under the Kingston Rhinecliff Bridge) and just north of the Kingston-Poughkeepsie Deepwater and the Rondout Creek with large beds of submerged aquatic vegetation and the globally rare freshwater tidal wetlands at the mouth of the Rondout (Kingston Point) just to the west of this proposed anchorage; and in addition just to the west of proposed anchorage Kingston Flats South are large beds of submerged aquatic vegetation off Kingston's Hudson waterfront and the globally rare freshwater tidal wetlands at the mouth of the Rondout (Kingston Point). All of these habitats would be threatened by petroleum spills or by river bed scarring through the use of heavy ground tackle. Further our neighbors in Rhinecliff and Port Ewen draw their water from the Hudson River. Their water source will be at risk.

Kingston's Hudson waterfront, including Kingston Point Park and Beach affords views of the Hudson and its eastern shore which will be obstructed by vessels anchored at Kingston Flats South and subject to light pollution from vessel deck lights and noise of generators. Additionally, the long-term parking of barges in the Kingston Hub is an added risk to recreational usages such as the public swimming beach, one of the only public swimming beaches on the Hudson, where swimmers already must leave the water whenever a vessel passes, due to the high wakes, and kayakers, canoeists, paddle boarders, rowers, wind-surfers, sail and pleasure boats, tourist boating excursions, the Rondout Rowing Club, Kingston High School Crew and the Hudson River Sloop Clearwater for which Kingston is the home port.

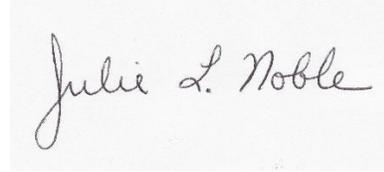
Since the three anchorage grounds in the vicinity of the City of Kingston will have a direct impact on the City's coastal natural resources and habitats, viewsheds, quality of life, recreational facilities, and tourism industry and would pose an inconsistency with the City's status as a Bronze Certified Climate Smart Community and with portions of its Local Waterfront Revitalization Program.

The Kingston CAC requests that the Coast Guard hold a public meeting and comprehensive briefing of elected and public safety officials, residents and businesses from the Kingston area at City Hall in Kingston to be hosted by the City. Such briefing should include additional technical details of the proposal, timelines and answers to the following questions:

- Will the Coast Guard comply with the National Environmental Protection Act with regards to any new proposed anchorage grounds?
- How many vessels per year would use such proposed anchorage positions on average?
- On average what would be the duration of stay for vessels at the anchorage?
- Define long and short term stays.
- What are the potential impacts with respect to noise and light?
- What are the potential viewshed impacts when considered from all points in the City of Kingston having views of the proposed anchorage sites as well as nearby areas within the Statewide Area of Scenic Significance?
- What is the potential economic impact to tourism from the proposed anchorages?
- What are the details regarding height, length and width of vessels at the proposed anchorage?
- What type of materials would the anchoring vessels be hauling?
- Will the proposed anchorages stir up existing PCBs in the river substrate?

Consistent with the Mayor of the City of Kingston as well as the Common Council of the City of Kingston, and based on the presently available information, the Kingston Conservation Advisory Council Kingston opposes the adoption of U.S. Coast Guard proposed rule 2016-0132 for the reasons cited above.

Sincerely,

A handwritten signature in cursive script that reads "Julie L. Noble". The signature is written in dark ink on a light-colored, slightly textured background.

Kingston Conservation Advisory Council

Julie Noble, Chair

Emilie Hauser, Vice-Chair

Kevin McEvoy, Secretary

Betta Broad

Lorraine Farina

Lynn Johnson

Casey Schwarz