



New York City Economic Development Corporation

USCG Docket-2016-0132  
Hudson River Anchorages Proposal

December 6, 2016

To whom it may concern:

We are writing in regard to the US Coast Guard's proposed rule to establish new anchorage grounds on the Hudson River between Yonkers and Kingston, NY. New York City Economic Development Corporation is the City of New York's primary engine for economic development, charged with leveraging the City's assets to drive growth, create jobs, and improve quality of life. Our management of City properties and assets generates revenue while creating jobs and new business opportunities. We partner with other City agencies to ensure that our properties, which include manufacturing and distribution hubs, transportation, and other infrastructure, are well-maintained and easily accessible. Supporting maritime commerce is a key component of our mission.

Use of the nation's waterways to transport bulk materials is an important component of an efficient, resilient and modally balanced transportation system. This is particularly important in the New York City region in which a large consumer market and dense urban fabric chronically strains highway and road way capacity. The inland waterways, including the Hudson River, have long served the region as a vital transportation corridor carrying fuel, construction materials, and other freight.

For more than three centuries the Hudson River has served the multiple functions of a maritime highway and safe refuge for vessels waiting out inclement weather. It is long established and an uninterrupted practice for vessels to anchor in the Hudson River when needing to remain stationary in during storms or periods of low visibility. The installation of anchorages does not affect existing practices nor facilitate turning the Hudson River into a "parking lot". The designation of federal anchorages in the Hudson is about safety and supporting regional resiliency.

Barge transportation is particularly suited to inland waterways like the Hudson River because of its width, depth, access to existing terminals, and relatively calm waters. Previous studies commissioned by NYCEDC, documented that, annually, waterborne transportation eliminates approximately 3.1 million truck trips because a typical inland barge has a payload capacity that is 60 times greater than one semi-trailer truck. In terms of fuel utilization, barges carry one ton of cargo more than 500 miles on one gallon of fuel.

A key consideration for supporting the rule change is to promote safety. Recent studies have demonstrated that water transportation has fewer incidents resulting in deaths and injuries than other modes. According to the *Texas Transportation Institute (TTI)*, “safety-related statistics for all modes of freight transportation show, on a rate per ton mile basis, that there is one fatality in the inland marine sector for every 22.7 fatalities in the rail sector and 155 fatalities in the highway sector.” In terms of injuries, TTI’s study indicated that there is one injury in the inland marine sector for every 125.2 in the rail sector and 2,171.5 in the highway sector.

Concern over spills of hazardous materials is a primary concern that has been voiced as a result of the Coast Guard’s anchorage proposal. While no mode can guarantee a spill won’t occur, recent studies have also demonstrated that water transportation’s record for handling hazardous materials, including petroleum products has been good. Comparing modes overall, spill rates are very low - with trucks losing only 6.06 gallons per 1 million ton-miles, railcars only 3.86 gallons and barges 3.6 gallons per million ton-miles.

In summary, NYCEDC supports the proposed rule because the expansion of anchorages on the Hudson will improve navigation safety and promote safe barge transportation that supports the local economy by providing needed raw materials while decongesting the region’s roadways.

Sincerely,

A handwritten signature in blue ink that reads "Andrew Genn". The signature is fluid and cursive, with the first name "Andrew" being more prominent than the last name "Genn".

Andrew Genn  
Senior Vice President