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Saw Mill River Audubon Comments on Proposal to Authorize New Anchorages in the Hudson River and Calls for Environmental Impact Statement

Saw Mill River Audubon represents over 1,100 members in communities from Peekskill to Tarrytown, New York, along the Hudson River shoreline in northwestern Westchester County.

Saw Mill River Audubon has deep concerns with the proposal to authorize new anchorages in the Hudson River. We have focused concerns with the "Proposed Montrose Point and Tompkins Cove Anchorage Grounds."

The "Proposed Montrose Point and Tompkins Cove Anchorage Grounds" are in and around Haverstraw Bay, a designated Important Bird Area, a significant area for fisheries, and a heavily-used recreational boating area.

The target area for both the Montrose Point and Tompkins Cove proposed anchorages is within the designated Lower Hudson Important Bird area, one of the most critical wintering Bald Eagle sites in the state, and becoming an important breeding area for Bald Eagles. Bald eagles are currently listed as a threatened species in New York: avoiding human disturbance at bald eagle nests is important to protecting the species. Some bald eagles are very sensitive to human activity and disturbance, especially at nest sites. Motor traffic, approaching too close on foot, frequency of visits or nearby tree removal can result in nest failure, nest abandonment, or abandonment of the nesting territory altogether. Any repeated disturbance by humans is unlawful under the Bald and Golden Eagle Protection Act, the Migratory Bird Treaty Act and under the Environmental Conservation Law of New York.

The proposed anchorages could also potentially degrade foraging habitat for migratory waterfowl, for which Haverstraw Bay is a critical stopover habitat on the Atlantic Flyway. Large numbers of waterfowl depend on the fish, submerged aquatic vegetation and other aquatic life in the river to sustain them during migration.

Anchorages can cause heavy disturbance of the river bottom and are demonstrated to damage the benthic habitat in a critical fish nursery zone such as Haverstraw Bay. Such disturbances also have the potential to release settled PCB's and other contaminants into the water column. "Long-term" anchoring of barges or ships can also result in ancillary pollution from detergents, paint, solvents, lubricants and other materials commonly used in operation and maintenance. Further, the hulls, anchor chains and bilge water of stationary barges and ships have the potential to harbor invasive plants and animals, which could become resident in this environmentally sensitive area of the Hudson River.

Haverstraw Bay is a well-documented estuarine fish nursery supporting the young of many species including endangered Atlantic and Short-Nosed Sturgeon, declining Shad and River Herring as well as important game fish such as Striped Bass. Many of these adult fish species also migrate through Haverstraw Bay in the spring and fall to and from the New York Bight in the Atlantic Ocean and Long Island Sound. Haverstraw Bay is a significant supporting habitat for fish populations in and beyond the Lower Hudson River.

We also note the likelihood of further negative impacts from this proposal in an area with a high volume of recreational boating. In addition to navigational hazards created by anchored barges or ships, the proposed plan may require tenders and security vessels, adding traffic in a high-volume recreational boating area where high- speed powerboats, jet skis, sailboats and sail-boarders are numerous, and where sudden changes in wind direction and velocity are common, with strong tides, currents and waves making precise navigation difficult. Boating accidents at the new Tappan Zee Bridge construction site involving stationary barges warn of the danger inherent in this proposal.

Long-term restoration and conservation of the Hudson River has been an American environmental success story. Initiated by Scenic Hudson, Hudson River Fisherman's Association, Riverkeeper, and Clearwater along with an unprecedented grassroots effort, widespread concern for the Hudson River continues today.

Creating these new Hudson River anchorages for commercial shipping runs counter to these longstanding efforts because of the high potential for environmental damage to this iconic American river.

Saw Mill River Audubon strongly and specifically opposes the proposal for the "Contemplated Montrose Point Anchorage Ground" as well as the overall proposal for over 40 long-term Hudson River anchorages. Further, we urge that a full environmental impact statement be required with public hearings accessible to residents in the affected Hudson River communities.