November 9, 2016

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

Dear Mr. Lapiejko,

Thank you for accepting public comments regarding the proposed anchorage sites along the Hudson River.

The Ralph T. Waterman Bird Club would like to go on record as strongly opposing the U.S. Coast Guard’s proposed plan to establish ten (10) anchorage fields in the Hudson River between Yonkers to Kingston for a total of forty-three (43) anchorage sites, or berths.

The Waterman Bird Club, based in Dutchess County NY, was founded in 1958. Our mission is to engage in educational, conservation, scientific, investigative, literary, historical, and philanthropic pursuits related to the population of birds in Dutchess County. In particular, our Conservation Committee is charged with informing and making recommendations to the Executive Board regarding local, state, and national governmental policies and actions which affect the natural environment and the conservation of natural resources. It is in this capacity that we express our strongest opposition to the proposed anchorage plan.

Our first and foremost objection is to the negative impact this plan will likely have on the rich diversity of birds that utilize the Hudson River and its environs.

The Ralph T. Waterman Bird Club is uniquely positioned to comment upon the importance of the Hudson River as a north/south migratory flyway for birds on the east coast of the United States, as a winter home for birds that are residents further north, as a summer resting ground for breeders from the north, and as a year-round home for a great diversity of bird species. Our club has maintained detailed records of avian activity in Dutchess County on a monthly basis since its inception in the year 1958. Additionally, intermittent monthly records can be found going as far back as 1945. Finally, we know that some of Dutchess County’s very first birders kept records and these records can be traced back as far as the 1870s. These records represent documentation of avian activity in our county, both inland and along the Hudson River corridor, for a period of over 150 years. Waterfowl and shorebirds that have been reported breeding, resting, feeding, or migrating along the Hudson River and its estuaries in our county during this span of time.
Include, but are not limited to, the following: Canada Goose, Snow Goose, Brant, Mute Swan, American Widgeon, Mallard, American Black Duck, Blue-winged Teal, Northern Pintail, Ring-necked Duck, Green-winged Teal, Canvasback, Lesser Scaup, Greater Scaup, White-winged Scoter, Long-tailed Duck, Common Goldeneye, Common Merganser, Red-breasted Merganser, Red-throated Loon, Common Loon, Red-necked Grebe, Double-crested Cormorant, Great Cormorant, Black-crowned Night Heron, Great Blue Heron, Great Egret, Osprey, Bonaparte’s Gull, Laughing Gull, Ring-billed Gull, Iceland Gull, Great Black-backed Gull, Common Tern, Spotted Sandpiper, Solitary Sandpiper, Western Sandpiper, Least Sandpiper, and Semipalmated Sandpiper.

In addition, the Bald Eagle and the Peregrine Falcon are raptors that breed along the banks of the Hudson in Dutchess County. Previously counted as endangered on the United States Fish and Wildlife Service Endangered Species List, these two birds have made a spectacular comeback in Dutchess County. Although more common now, sightings of either of these species are still regarded as a privilege and are enjoyed by birders from many other counties. Constant vigilance is required to ensure that their populations continue to grow and thrive.

Detailed support for our assertion that the Hudson River provides crucial habitat for birds can be found by referring to the thoroughly researched, data-based guide to the current and historical status of the birds in Dutchess County, written by Stan Deosey and Barbara Butler. First published in 2006, it is entitled The Birds of Dutchess County New York. For further information, please see our website www.watermanbirdclub.org, where an online version of this publication can be found, including updates current to 2016.

There are other compelling reasons that the Ralph T. Waterman Bird Club opposes the anchorage plan. Because the Hudson River is actually an estuary, it is a biologically rich environment, making it an important ecosystem for various species of aquatic life, amphibians, reptiles and birds, all of which are interdependent. We have great concern about the deleterious effects on the Hudson River ecology which would result from potential hazards such as oil leakage or spills, dredging, loud noise levels, and the shining of bright lights during nighttime hours, all of which put migratory birds at high risk (“Birds may be fatally attracted to artificial lighting and become disoriented”---National Geographic Today, April 17, 2003; “The Impact of Artificial Lights on Wildlife”: https://nhdecozine.com/2012/05/29/the-impact-of-artificial-lights-on-wildlife/).

In addition to posing a significant environmental risk to our county as well as other counties up and down the Hudson whose waters are within the scope of this plan, the proposed anchorages would jeopardize the full enjoyment of the scenic beauty and recreational opportunities of our region, not the least of which is birding but which also includes fishing, boating, and hiking. Evidence of bird life is sought and appreciated while engaged in any or all of these activities.

The Ralph T. Waterman Bird Club appreciates the United States Coast Guard’s efforts in seeking comments on the establishment of new anchorage grounds. Based upon the potential for myriad adverse impacts to our region if the Anchorage Plan is implemented, our Club strongly opposes the establishment of these ten anchorages and forty-three long-term berths, and urges you to give full consideration to our comments.

Respectfully submitted,

David Grover
President, Ralph T. Waterman Bird Club