



GRASSROOTS Environmental Education

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Comments to United States Coast Guard Regarding Barge Anchorage Sites on the Hudson River Docket ID: USCG-2016-0132-0001 December 6, 2016

Grassroots Environmental Education is a science-based environmental health nonprofit serving local and state governments, school systems, health professionals and other organizations nationwide. Our mission is to educate the public concerning common environmental exposures and the links to human health and environmental impacts.

Grassroots Environmental Education requests that the United States Coast Guard reject the proposal to add 43 new commercial berths along the Hudson River. This proposal also threatens to re-industrialize the Hudson, and it could negatively impact our environment, riverfront communities, and local economies by allowing increased crude oil transport on the river. Forty-two out of forty-three berths are designated as "long-term," meaning that they could be used as floating oil storage sites.

Of utmost concern is that one of the proposed anchorage sites, Tompkins Cove, abuts the "Pipeline Area" which includes 3 large, diameter, high pressure gas transmission pipelines. Spectra's two Algonquin gas pipelines run directly under the Indian Point nuclear power facility and the third pipeline, the new Spectra AIM pipeline crosses the nuclear plant for 2,159 feet and runs within 105 feet of its critical safety infrastructure, which lies outside the gated area. Spectra Energy has a significant history of safety issues and pipeline violations. In May of 2015, a Spectra Energy pipeline rupture occurred under the Arkansas River unbeknownst to the company for 24 hours at which point they were notified by the Coast Guard who had been contacted by a tugboat captain on the river.

A pipeline rupture in the Hudson River could damage a vessel parked in close proximity. Furthermore, dropping anchor could damage the pipeline triggering a rupture that could in turn damage the vessel and cause an oil spill. A pipeline rupture also threatens Indian Point and could result in a nuclear disaster threatening more than 20 million people who reside within the 50 mile impact radius.

What impact would a massive oil spill from an oil barge have on the Indian Point nuclear facility that uses large quantities of water from the Hudson River to cool the reactors and the radioactive spent fuel?

The increased transport and storage of crude oil on the Hudson River would increase the risk of harmful oil spills and contamination of drinking water supplies, impair and degrade coastal revitalization efforts, significantly contribute to noise, light and air pollution in this region which is already classified as a non-attainment area for air quality standards. Recreation, boating and tourism would be harmed. Increased transport and storage of crude oil will promote polluting and climate destroying fossil fuel extraction. Anchors and chains will scar and disturb the river

bottom and will threaten several endangered species in the Hudson River including the Atlantic and Shortnose sturgeon.

The Hudson River should not be turned into an oil hub. Crude oil cannot be recovered or cleaned in the event of an oil spill. Studies have shown significant increases in the presence of lesions and other deformities in many species of fish subjected to these spills such as in the Chaudiere River near Lac Megantic, Quebec following the oil train disaster.

If the Coast Guard proceeds with this proposal a comprehensive environmental impact study should be conducted before any decisions are considered.

Grassroots Environmental Education recommends, in the strongest possible terms, the rejection of this proposal, which would significantly endanger the Hudson River and millions of people in the region that surrounds it, the most densely populated area in the nation.

Respectfully submitted by,

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