

David TubioloLegislator, 14th District

Chair, Committee on Seniors & Constituencies

*Voice of the People of Westchester County for over 300 years***Committee Assignments:**
Infrastructure
Public Safety & Social Services

Dear Rear Admiral Poulin:

On behalf of the wonderful people of District 14 (Mount Vernon & Yonkers), I write to you today to express our adamant opposition to the contemplated Yonkers extension anchorage site as proposed in docket number USCG-2016-0132. My district encompasses Sarah Lawrence College which is home to the Center for the Urban River at Beczak, located on the estuary and directly across from one of the many new proposed additional anchorage sites in Yonkers.

Many of the river towns of Westchester County have been going through a renaissance, rehabilitating our downtowns and attracting new businesses and industries. In speaking with residents of District 14, it is clear the proposed rule would severely hurt the progress we've made in the past decade.

Much scientific evidence has been put forward which demonstrates that this process must not move forward from the advanced rulemaking process to the rulemaking stage, including, but not limited to:

- The Coast Guard's failure to adhere to its own *Waterways Management: Anchorage Management Tactics, Techniques and Procedures (TTP)* (CGTTP 3-71.2 July 2015) (WWM) during the rulemaking process;
- The Coast Guard's failure to follow federal Coastal Management Zone notification requirements and provide notification to required stakeholders, including the County of Westchester which I represent;
- The Coast Guard's failure to perform federal NOAA consistency review with adopted inland waterway local waterfront revitalization plans as required by federal and state law and rule;
- The Coast Guard's failure to comply with federal historical, cultural, and ecological designation consultation requirements for the Hudson River attendant to its designation as an American Heritage River, National Heritage Area, National Historic District, National Historic Landmark District, Essential Fish Habitat, Significant Coastal Fish & Wildlife Habitat, and Scenic Area of Statewide Significance; and
- Although not technically required, the Coast Guard's failure to request a full environmental impact statement under the National Environmental Policy Act to address the myriad impacts which this proposal will likely have on the Hudson River estuary and its surrounding communities, including, but not limited to:
 - detrimental impact to local waterfront land use and planning;

Tel: (914) 995-2815 • Fax: (914) 995-3884 • E-mail: Tubiolo@westchesterlegislators.com

800 Michaelian Office Bldg., 148 Martine Avenue, White Plains, N.Y. 10601 • www.westchesterlegislators.com • 914 995.2800 (main voice)

- concerns regarding the impact on socioeconomics, environmental justice, recreational and heritage tourism use;
- the potential for contamination, spillage, flotables and water quality impact;
- physical damage caused by sedimentation, erosion, and the disruption of the riverbed with the potential re-propagation for pollutants such as PCBs;
- new and existing hazards for our fishery, wildlife and endangered species who call the estuary home;
- noise, light and air pollution affecting those who live on and around the river;
- the risk of a catastrophic spill or homeland security event; and
- the navigational hazard presented for existing river traffic as well as recreational users.

These reasons alone disallow additional anchorages in the Hudson River, what is proudly called the 'Rhine of America'. I'm especially concerned about the anchorage site near Indian Power Plant, where it's a potential safety issue, not just for local residents, but for the whole New York metropolitan area.

Many of these topics have been discussed at length in the thousands of submissions you have received, yet none have been addressed by the Coast Guard or the rule's few proponents.

As a proud cosponsor of Resolution 104-2016 of the Westchester County Board of Legislators, which passed unanimously, I can unequivocally state that the standard for establishing new anchorage grounds has not been met. On behalf of the people of District 14, it must therefore be rejected. Please feel free to ask any questions, my door is always open to you. I remain,

Yours truly,



DAVID J. TUBIOLO
Westchester County Legislator
District 14

CC:
Center for the Urban River at Beczak
Clearwater
Federated Conservationists of Westchester
Riverkeeper
Scenic Hudson
Sierra Club Lower Hudson Group
Westchester County League of Conservation Voters