



P.O. Box 226
20 Nazareth Way
Garrison, NY 10524

PHONE: 845.424.3358
FAX: 845.424.3483

info@hhlt.org
www.hhlt.org

BOARD OF DIRECTORS

Nancy Berner
Chair

James Cross
Vice Chair

Seamus Carroll
Treasurer

Rudolph Rauch III
Secretary

Douglas Banker
Gilman Burke
Kim Conner
Christopher Davis
Irvine Flinn
James Hartford
Laura Hromadka
Henry L. Kingsley
Daniel Kramer
Lars Kulleseid
Douglas Land
Claudio Marzollo
David K. A. Mordecai
Frederick Osborn III
David Redden
Robert Rhodes
Frederic Rich
William Schuster
Anne Sidamon-Eristoff
Bente Strong
Anne Symmes
Bonnie Turner
Glennon Watson
Lissa Young

HONORARY DIRECTORS

Anne Cabot
Bevis Longstreth
Ralph Odell
Katherine Roberts
Jean Wort
Cecil Wray

STAFF

Michelle Smith
Kathy Hamel
Jonathan Leitner
MJ Martin
Katrina Shindlecker
Nicole Wooten

December 1st, 2016

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

Re: Advanced Notice of Proposed Rulemaking – Anchorage Grounds,
Hudson River; Yonkers, NY to Kingston, NY Docket No: USCG-2016-0132

Dear Mr. Lapiejko,

On behalf of the Hudson Highlands Land Trust, I am writing to express our concerns related to the Proposed Rulemaking regarding new Anchorage Grounds along the Hudson River.

The Hudson Highlands Land Trust (HHLT) is a 27-year old community-based, accredited land conservation organization devoted to protecting the natural resources, rural character, and scenic beauty of the Hudson Highlands area of New York State.

The Hudson River, from Beacon to Peekskill, including associated tributaries, wetlands and marshes, lies at the heart of our mission area. Decades of efforts and expenditures by Hudson River communities and allied organizations have been invested in cleaning and restoring the health of the river, and we have expanded on this tradition by protecting the land surrounding the river in the Hudson Highlands area.

We are concerned the proposed anchorage grounds would adversely impact the natural resources and scenic beauty we have spent decades preserving, for the following reasons:

Increased Oil Transport: The maritime industry's request for these anchorage grounds is largely based on an expected increase in commercial river traffic, and particularly an increase in the transportation of crude oil. We are very concerned that facilitating greater flow of oil transportation on the river increases the likelihood of an oil spill. In a tidal river like the Hudson, spilled oil will move very quickly up and down stream and into various marshes, like Constitution Marsh in our mission area. It will be



impossible to clean up and cause lasting damage to our precious natural resources.

Impact on Economic Development: All the riverfront communities in our mission area have dedicated significant planning and financial resources to facilitating enjoyment of the natural assets and scenic beauty of the Hudson River shoreline, which are central to economic development plans. Anchorages on the river, increased river traffic, the associated light and noise pollution, and the potential for oil spills will negatively impact these efforts.

Other Natural Resource Impacts: The Hudson River is home to endangered species, such as Atlantic and shortnose sturgeon, that rely on the river bottom to spawn, feed, and rest. As for birds, one of the proposed anchorages (between Newburgh and Beacon) is adjacent to Denning's Point, which is critical habitat for bald eagles over the winter. The proposed anchorage grounds are likely to have an adverse impact on these and other key species.

For all these reasons, we are concerned about the impact the proposed anchorage grounds may have on our region and, more broadly, all along the Hudson River.

We also understand there is strong, bipartisan opposition to the proposed anchorage grounds in communities all along the Hudson River. We ask that you listen carefully to all these voices. If, in spite of this opposition, the Coast Guard proceeds beyond this phase, we urge a **comprehensive environmental review, including a full environmental impact statement.**

Sincerely,



Michelle D. Smith
Executive Director