

Water Defense  
PO Box 204, Livingston Manor, NY 12758  
Tel (845) 439-1099  
[info@waterdefense.org](mailto:info@waterdefense.org)  
[www.waterdefense.org](http://www.waterdefense.org)



DECEMBER 6, 2016

### **United States Coast Guard**

Rulemaking Comments: Anchorage Grounds, Hudson River; Yonkers, NY to Kingston, NY  
RE: Document ID: USCG-2016-0132-0001

#### COMMENT:

Water Defense is a 501(c)(3) non-profit dedicated to the protection of clean water. Our mission is to use technology and public engagement to keep our waterways and drinking water sources free from contamination and industrial degradation.

Water Defense completely opposes the establishment of new anchorages on the Hudson River as proposed by the commercial maritime industry. We specifically oppose the 43 new anchorages proposed at 10 sites from Kingston Flats South to Yonkers.

Water Defense is particularly concerned by the negative impact of additional anchorages on waterfront tourism and coastal revitalization efforts, and, most importantly, the increased public health and safety risks from oil spills and explosions.

The Maritime Association of the Port of NY/NJ Tug and Barge Committee, the Hudson River Port Pilot's Association, and the American Waterways Operators made it clear in their request to add these additional anchorages that their purpose is to help increase oil transport on the river. They said, "Trade will increase on the Hudson River significantly over the next few years with the lifting of the ban on American Crude exports for foreign trade and federally designated anchorages are key to supporting trade." This is an inappropriate, unnecessary, and unacceptable use of a public resource. The public has spent the last 50 years mandating an extremely difficult clean-up of the historic contamination of the Hudson River from industrial waste-products such as polychlorinated biphenyls (PCBs), and tremendous progress has been made. We cannot tolerate an increase in traffic for tankers and barges carrying dirty tar sands (technically called bitumen) and Bakken oil, materials perhaps impossible to remediate once spilled and that would jeopardize all of the progress made in cleaning up this magnificent river, while simultaneously putting surrounding communities at grave risk.

The threat of oil spills and explosions is real and deeply concerning. Bakken oil is highly volatile, as are tar sands, which are diluted with petroleum-based products to facilitate transport. Tar sands are also heavier and denser than water; if spilled, they would sink straight to the river bottom and be almost impossible to clean up. Six years ago there was a major tar sands spill in the Kalamazoo River, and after a \$1 billion cleanup, the river is

still contaminated. In addition, the construction of the anchorage sites itself poses a risk of stirring up silts that may contain PCBs that should not be mobilized by such activities. Testing of these sites for PCBs should precede any construction activities, and no further construction should be done in any site that is contaminated and has not been fully remediated.

Spills from increased shipping and contamination from construction activities could adversely impact the drinking water supplies of Rhinebeck and Port Ewen, which are immediately proximate to proposed anchorage sites, as well as other municipalities that are downstream; spilled oil or other contaminants could reach the drinking water intakes of four additional locations within a few hours.

These new proposed anchorages are unnecessary for current levels of shipping traffic, as two anchorages already exist to serve current needs, and no new anchorages should be approved. Increased shipping on the Hudson also poses the potential of conflicting with existing and planned tourism activities along the Hudson, including kayaking, boating, and ice-sailing. Moreover, the anchorages themselves would adversely affect planning for and use of riverside and water trails. The visual impact and light pollution from large, commercial ships, as well as the increased safety hazards, make increased industrial use along the Hudson an unacceptable option.

Given these risks, a full Environmental Impact Assessment of this proposal should be mandated. Further, as these risks increase proportionate to the number of new anchorages constructed, the number of new anchorages should be kept as low as possible and sites should be considered only if they do not pose hazards to the public or the environment. Therefore, a detailed site-specific analysis of each proposed site should be required, addressing all possible environmental and safety impacts, along with conflicts with existing and planned river and riverside tourism plans.

Warm regards,

**Sam Wright**

Program Director

Water Defense

[swright@waterdefense.org](mailto:swright@waterdefense.org)