



Friends of the Old Croton Aqueduct, Inc.

Keeper's House, 15 Walnut Street, Dobbs Ferry, NY 10522-2109

November 26, 2016

U.S. Coast Guard First District

Commander Linda Fagan

408 Atlantic Avenue

Boston, MA 02110

Re: Letter against Proposed Rule for Anchorage Grounds on the Hudson

Docket ID: USCG-2016-0132

Dear Commander Fagan:

The Friends of the Old Croton Aqueduct Inc. (the "Aqueduct Friends") are strongly opposed to the proposal to establish 43 additional anchorage berths in the Hudson, stretching from Yonkers to Kingston, in NY. The proposal calls for "long-term use" (with the length of time undefined and unlimited) of anchorages. This proposal is not about providing a temporary port in a storm or in an emergency. Under Maritime Law, ships can anchor anywhere along the Hudson River under these circumstances and do not need a pre-established anchorage. The Aqueduct Friends are aware that the Hudson River already is a busy waterway used for the delivery of an increasing quantity of Bakken crude oil going south and refined gas products going north on the river. The proposal we are commenting upon is not about this existing commercial use of the Hudson. It is about establishing long-term parking for oil barges on the river.

The Aqueduct Friends, established in 1989, is a private, nonprofit volunteer 501(c)(3) organization formed to protect, preserve and promote the Old Croton Aqueduct. The Aqueduct Friends work to raise public awareness of the Aqueduct and trail and to secure the resources that will enable this historic greenway to remain unspoiled in perpetuity. The Aqueduct Friends strive to act as a public voice for the Aqueduct as well as a source of information and education for those interested in its past and future. The membership of the Aqueduct Friends is largely drawn from the communities traversed by the Old Croton Aqueduct, but members also include many people both near and far, who are captivated by the window into New York City's history,

*The Friends of the Old Croton Aqueduct is a not-for-profit 501(c)(3) organization.
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and the insight into water as a critically important resource, that the Aqueduct dramatically provides. In this connection, the Aqueduct Friends work closely with the 10 Westchester communities along the Aqueduct (which runs parallel to the Hudson River for much of its length), of which eight -- Yonkers, Hastings, Dobbs Ferry, Irvington, Tarrytown, Sleepy Hollow, Briarcliff Manor, and Ossining – sit directly on the shore of the Hudson River. The Old Croton Aqueduct in Westchester, a New York State park, was designated as a National Historic Landmark in 1992, in recognition of the large and complex water supply system for New York City, which was constructed between 1837 and 1842.

Our greatest concern is a possible oil spill, which could cause incalculable harm to the health of the River, its ecosystem, and its surrounding communities. The parked oil barges would present a clear and present danger to the river and the communities along both of its shores. This harm should be measured not only by the probability that the harm could occur, but also by the severity of such harm if it were to occur. The threat of an oil spill is high. During the construction of the new Tappan Zee Bridge, there have been several accidents involving both pleasure and commercial craft colliding with what is a stationary, well-lighted construction project. Were even one of such accidents to happen involving an anchored oil barge (which, depending upon the size of the barge, may not even be required to be lighted), the results could be catastrophic. The Hudson River, because it is a tidal estuary, flows both ways. Once a spill occurs, it would be highly unlikely that it could be contained or recovered and damage to the river prevented. While this danger exists with the current river barge traffic, the probability of it occurring would be multiplied many times over by having 43 oil barges parked at anchor in a very busy (and narrow) transportation channel, heavily used by both commercial and recreational boats. If an oil spill were to occur, the spill would occur in proximity to unique ecological areas, including the Piermont/Haverstraw wetlands that serve as a refuge for birds, and tidal estuary waters that provide breeding grounds for fish and other aquatic life from near and far, creating irreparable harm to these natural habitats. An oil spill would also reverse all of the progress that has been made toward reestablishing beaches along the river (such as at Croton Point). ***Close to the heart of the Aqueduct Friends' concerns, such a spill could eliminate the use of the Hudson River as a source of drinking water for those communities that now draw water from the river, from Poughkeepsie and farther north along the Hudson River.***

A long battle has been fought and many public and private resources expended to counteract the ravages of the industrial pollution of the Hudson River and its surrounding communities that occurred in the 19th and 20th centuries. In 1997, the Hudson River was declared an American Heritage River, due to its historical, natural and recreational significance. The River is in the National Registry of Historic Places. The Hudson River is vitally important now and in the future to the health and vitality of the communities along its shores, as well as to the wildlife that it harbors. These anchorages pose a grave threat to the Hudson River and its surrounding communities. The Aqueduct Friends strongly support the decades-long efforts of these communities to

revitalize their waterfront areas. Organizations such as Riverkeeper and the Hudson River Waterfront Alliance, continue their fight to restore the Hudson River, monitoring the health of the River and advocating for its environmental survival. Local community efforts up and down the Hudson River have resulted in multiyear improvement plans and the creation of waterfront parks that are vital centers for recreational activities, public events, and tranquil enjoyment of this vital resource. These improvements are revitalizing the economies of these communities and their desirability as places in which to work and live.

Dramatically increasing the anchorages established for long-term use in the Hudson River creates additional pollution risks. Due to industrial misuse in the past, the bottom of the Hudson River is covered with PCBs, which have not been removed, but have settled on the bottom of the river, so their presence in the river water is minimized. The anchors and anchorage chains of parked barges will drag along the bottom of the river and stir up this toxic lining, re-polluting the water with circulating PCBs. There is potential harm to river bottom habitats, including a threat to two endangered species, the Shortnose and Atlantic sturgeon; increased hazard to recreational activities; and increased light and noise pollution.

Most recently, Hudson River towns and villages fought long and hard to retain the iconic natural landscape views of the Palisades along the Hudson River. The Aqueduct Trail overlooks stunningly beautiful vistas of the Hudson River, which inspired the Hudson River School of artists. We would like those views to be preserved. A parking lot of oil barges would deal a severe blow to these efforts. What is now a beautiful river would become an eyesore of parked oil barges, bringing with them harsh ballpark stadium lighting, generator and other noise and water pollution, as crews carry out maintenance and repair work on the barges.

The Aqueduct Friends oppose this proposal for the many reasons discussed above. We thank you for this opportunity to comment.

Sincerely,

/Signed/

Mavis Cain

President, Friends of the Old Croton Aqueduct

Cc: Board, Friends of the Old Croton Aqueduct