December 5, 2016

Regarding:  Barge anchorages along the Hudson River
Commenting on:  Docket: USCG-2016-0132

To:  U.S. Coast Guard

At our organization's recent meeting a resolution was passed by our members, the elected officials of all municipalities in Westchester County, authorizing me to contact the U.S. Coast Guard and our State and Federal elected representatives and to send a letter with our concerns opposing the recent suggested barge anchorages and to further let everyone know that the members of WM0A stand solidly behind the municipalities along the Hudson River in requesting that the U.S. Coast Guard plans for additional barge anchorages be abandoned. This letter includes those comments which were already sent to Westchester's State and Federal elected officials and I would ask that they become part of the public record for docket USCG-2016-0132.

All of the municipalities along the Hudson River found out about the Coast Guard’s plan for installing additional anchorages well after the original meeting date set by the Coast Guard to discuss this. There was no communication from the U.S. Coast Guard to any involved municipality and as such it was an obvious violation of the process. We appreciate the extension to December 6th you have provided.

Local Waterfront Revitalization Plans

While we appreciate the need for these oil transport companies to maximize profits we are also very concerned about the waterfront revitalization efforts many of the municipalities along the Hudson River have worked on and the impact the planned Coast Guard anchorages will have on the vision outlined in these LWRP's.

Westchester municipalities along the Hudson have spent many hundreds of millions of dollars on their waterfront revitalizations plans which including private monies have already driven over one billion dollars in investments in the waterfront. These revitalization plans were not made in a vacuum. Many municipalities, now being threatened by the anchorages, previously developed specific Local Waterfront Revitalization Plans (LWRP's) which were approved by NYS Department of State and in turn sent to NOAH’s Office of Coastal Management for approval and incorporation into the State’s Coastal Management Program. All involved Federal agencies, including the U.S. Coast Guard, would have been given notice by NOAH and would have had the opportunity to comment on each and every LWRP during its approval process.
Once a municipality’s LWRP was approved both public and private groups were able to start projects supported by the LWRP and its vision. These projects have committed large investments, generated many jobs and have begun to transform the waterfront of these neglected areas. We wonder if the Coast Guard is even aware of the efforts many of our municipalities are making with their planned improvements and the impact these anchorages will have on their success.

Environmental issues

A small river barge can handle 30,000 barrels of oil, a coastal barge can handle up to 340,000 barrels of oil. Larger barges at these anchorages will hold over 14 million gallons of oil, about the size of the Exxon Valdez spill in Alaska.

In a recent Hudson River Water Alliance’s (HRWA) meeting with maritime experts present we were told that the request for anchorages from the Coast Guard was to support the movement of Baken crude oil from the Port of Albany. We were also told that prior to requesting these anchorages that the company in question tried to get two different oil tankers up the Hudson. One was over 1,000 feet long which ran aground and put a gash in the outer hull of the vessel. The second ship was wider and shallower but could not make all of the needed turns in the Hudson to stay in the narrow shipping lane. It was also explained by the maritime experts in that meeting that the Hudson River’s navigable channel is extremely narrow and having barges swinging on their anchorages can only cause problems with ships trying to maneuver in the channel.

The Coast Guard must know the efforts that have been made to clean up the Hudson River from a variety of industrial problems. Organizations like Riverkeeper, Clearwater, Scenic Hudson and others have spent years educating all of us about the value of a clean Hudson River to our local economies and the municipalities along the river have listened and have planned, spent and continue to spend money improving their waterfronts. A restored Hudson River, following the revitalization plans of our municipalities, is one of the biggest economic engines for Westchester County in this century.

A clean Hudson River and a waterfront with beautiful Hudson Valley vistas enticing millennials to live along the Hudson River with new residential units, parks, retail and restaurants is what these municipalities have been working towards. The Coast Guard’s solution of large oil laden barges which swing over 1,200 feet on their anchorages, with generators running all night to keep lights on them working so other river traffic will not collide with them will destroy the vision and work these riverfront municipalities have committed themselves to.
What will it be like along this tidal estuary if any of those single hulled barges were to leak or worse yet get a larger hole from some flowing ice dams or collision at night as they swing on their anchorage? Don't forget that the bulk of these oil filled barges are underwater and if the estuary's tidal flow is inland a barge will swing in that direction regardless of the size of the ice flow or jam opposing it. Which one will win? The entire Hudson estuary could be setback a decade.

Security

We would also ask what security is being contemplated? Since 9/11 and with the recent problems in the news and the OEM planning we all do, we are very concerned about security. We feel having oil laden barges sitting along the shoreline of the Hudson estuary is asking for trouble. How is security being handled? Who is responsible? How many miles of river front need to be secured? A small boat with a bomb onboard is sufficient to put a big enough hole in a barge to sink it and dump much of its contents into the Hudson River estuary. A larger boat that happens to collide or is purposely driven to collide with one of these barges will do the same.

A review of this Coast Guard plan and that of the larger New York City harbor will suggest that there are areas of the harbor that are industrial in nature, that are out of the way of serious ice flows and that will remain as such. There are definitely other areas where the barges can be better secured as opposed to lining the edges of an active waterway with low profile, parked, swinging on anchorage, oil laden barges.

The Westchester Municipal Officials Association and its member municipalities are not in favor of the parking of barges in the 750 acre area the U.S. Coast Guard is proposing and we would ask that the U.S. Coast Guard reconsider and move these barges to other more appropriate location in the New York harbor.

Sincerely,

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CC: US Congressman Sean Patrick Maloney, Deputy Mayor Susan Gerry - City of Yonkers, County Exec Rob Astorino, Riverkeeper, HRWA, Clearwater, Scenic Hudson, NYS Assemblyman David Buchwald, NYS Senator Terrence Murphy, Anne Janiak, WMOA Director