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NEW JERSEY CHAPTER

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December 1, 2016

Dear U.S. Coast Guard:

We are very concerned with the plan to establish 10 new anchorage grounds for commercial vessels in the Hudson River from Yonkers, New York, to Kingston, New York. These massive barges would be up to 600 ft. long with more than 40 berths or “parking lots” along the river. The New Jersey Sierra Club is opposed to this project because it will cause significant harm to the Hudson River ecosystem, while threatening public safety throughout the region and interfering with people’s access to the waterfront. We believe the Coast Guard must reject this proposal for its various environmental and public health concerns.

We believe that this plan has not been thoroughly evaluated. There would a constant process of loading and offloading from these barges, meaning an increase in ship and barge traffic. However, there has not been National Environmental Policy Act (NEPA) review for this project to evaluate the extra air, noise and water pollution from this proposal. There has also not been a proper analysis of safety and environmental consequences of a possible spill or accident in the area. With this proposal, the Hudson River will not only become a barge highway, but a parking lot for barges stretching for miles and miles. This will not only block traffic along the River, but is a huge safety threat. An Environmental Impact Statement should have been completed for this proposal. However, the Coast Guard has failed to complete one nor have they completed an Environmental Assessment.

We are also concerned that this proposal has not been reviewed by the National Marine Fisheries Service (NMFS) due to the amount of wildlife and fish in the area. Species such as the Endangered Atlantic or Shortnose Sturgeon as well as sea turtles and mammals, including various species of whales, could be impacted. Anchors and chains scar and disturb the river bottom. Atlantic and shortnose sturgeon rely on the river bottom to spawn, feed, and rest. Even the Endangered Right Whale has been spotted in the area. We are concerned that this project would disrupt these Threatened and Endangered species and a thorough review should have conducted this analysis.

These barges would interfere with the ability of people to enjoy recreation along the Hudson River. The additional ship and barge traffic, as well as the smell of diesel and noise, will have significant impacts on tourism. The Coast Guard must thoroughly investigate exactly how these types of pollution will affect riverfront communities and aquatic ecosystems before deciding whether to proceed with the proposal. We also believe that increased vessel traffic, spoiled viewsheds, and possible oil spills could undermine local waterfront revitalization efforts that are meant to improve local economies and the quality of life in the Hudson Valley.

Given the amount of historic sites along and near the Hudson River, we believe a Historic 216 Review by the National Parks Service should have been conducted. This is critical because Gateway National Recreation Area, Liberty State Park, Ellis Island, and the State of Liberty could all be impacted if there was a spill or explosion on the Hudson River. These areas should remain places for the people of New Jersey to recreate, learn and enjoy the outdoors. Without the proper analysis on the proposal's impact on the environment, air quality, and historic sites, including at least an Environmental Assessment and 216 Historic Review, the Coast Guard should deny this permit application.

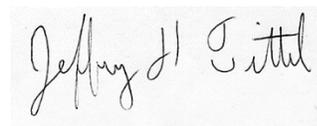
Even though the industry claims the proposal is for navigation safety, it is really about increasing the amount of oil being shipped by barge. Starting in 2012, the Hudson River became a shipping corridor for about 25 percent of the crude oil coming from North Dakota Bakken Shale. In addition, the Global oil terminal in Albany is fighting to gain permission to heat heavy "tar sands" crude for transport down the Hudson.

An accidental crude oil spill or tar sands oil spill in the Hudson River can never be recovered or properly cleaned up. We believe regardless of how explosive crude oil is shipped it is a ticking time bomb. Accidents from transporting crude oil have led to derailments with train cars setting on fire, homes being destroyed, forced evacuations of entire towns, threatened water supplies, major environmental impacts, and human casualties. A spill or explosion would not only be an environment disaster, but could be a tragedy threatening millions of people along the River.

We are also concerned that proposal threatens to re-industrialize the Hudson River. The tug and barge industry requested additional anchorages in part to support an increase in crude oil transport. The forty-two of the forty-three berths are designated as "long-term." We believe that with the increased transportation storage of crude oil the more likely the chance that there will be a devastating oil spill on the Hudson River.

The Coast Guard must reject this environmentally damaging proposal, protect the Hudson River as well as the public health and safety for people living in the New York Metropolitan area. If this project moves forward in any capacity, we urge you to host public hearings on this issue throughout the Hudson River Valley.

Sincerely,

A handwritten signature in black ink that reads "Jeff Tittel". The signature is written in a cursive, slightly slanted style.

Jeff Tittel

Director, New Jersey Sierra Club