

COMMENT from  
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The Coast Guard (USCG)

Proposed rule: Anchorage Grounds, Hudson Rivers, Yonkers, NY to Kingston, NY

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We ask that your agency, the U.S. Coast Guard, insist there be a comprehensive environmental impact statement and public hearings on any proposals before any decision is made on this proposal to allow the building of additional anchorage grounds for commercial vessels in the Hudson River. These anchorages will mean that crude oil shipped by train to Albany and other ports presently, will be put on barges to complete the oil's transit to refineries in New Jersey. However, these proposed new multitude anchorage points will be essential to increasing storage capacity of these fossil fuels.

Tourism in the area is increasing. As one of our member said, "We have just moved to Woodstock, New York and have visited various attractions and sites along the Hudson River." Riverkeeper has noted, "Leaders from cities, towns, counties, and statewide offices are voicing a wide range of concerns; that barges will affect waterfront tourism, present hazards to public safety and boating, and pose new and unmitigated oil spill risks. Many localities along the Hudson have long-term waterfront goals, coastal revitalization policies, or park and historic preservation plans that would be negatively affected if these anchorages are made official."

The beauty of the Hudson has been harmed enough from prior industrialization, with damage still in evidence as exemplified the PCBs left by General Electric which is still not rectified—meaning that eating fish caught in the Hudson is still hazardous, as the 200 mile length of the River is still a superfund site.

These anchorages could further degrade the biodiversity of the Hudson River. Even though the industry claims the proposal is for navigation safety, it is really about storage of Bakken fuel and fuel from the tar sands in Canada. There is presently a shortage of storage facilities to accommodate the fossil fuel that has been produced. Even with the recent OPEC "agreement to limit oil production"

the effects will not be apparent for a while if at all. In the meantime the EIA has reported as of November 25, 2016, that inventory facilities are at high capacity.“ U.S. commercial crude oil inventories (excluding those in the Strategic Petroleum Reserve) decreased by 0.9 million barrels from the previous week. At 488.1 million barrels, U.S. crude oil inventories are near the upper limit of the average range for this time of year. Total motor gasoline inventories increased by 2.1 million barrels last week, and are well above the upper limit of the average range. Both finished gasoline inventories and blending components inventories also increased, as did distillate fuel inventories which increased by 5.0 million barrels last week and are well above the upper limit of the average range for this time of year. Propane/propylene inventories fell 1.9 million barrels last week but are near the upper limit of the average range. Total commercial petroleum inventories increased by 0.5 million barrels last week.” ( See: <http://www.eia.gov/petroleum/supply/weekly/pdf/highlights.pdf>)

If there is not adequate storage facilities, these excess products will have to be sold at depressed prices as there would be no place to park it until inventory is lower. This will affect the Industries' bottom-line even more than the current depressed prices for oil already has. What this means is that using the Hudson River for an oil transit highway to refineries in order to increase finished market products will only depress prices further. These anchorages will be come parking places for as many barges as will fit into them, so this plan is not a transportation plan as is claimed, but in reality, an auxiliary storage plan.

The Hudson River is important to the communities that are on its shores. We understand that commerce has always been a part of the River traffic but shipping of rocks or other materials that cannot chemically harm the life and quality of the River is acceptable. However a total of 43 anchorage births in 10 locations for storage is unacceptable. (The distance from Yonkers to Kingston is 93 miles. The total length of the Hudson River is 315 miles. Therefore these anchorages will approximately span over one third of the entire Hudson River.) The shores of the Hudson River cannot become a storage parking lot for the fossil fuel industry. One barge leaking, or catching fire will be disastrous, one barge 'traffic' collision or storm related event will mean many millions of dollars of damage, much not repairable. Renewable energy sources are approaching price parity. The growth of fossil fuel infrastructure is out of date. We question whether these proposals are coming from companies trying to lessen their losses from their stranded assets, and question why the public should bear the burden of the risks this scheme involves.

Moreover, renewables are becoming very cost effective without causing the wreckage of our environment from which we cannot escape. There is no

economic reason to invest in old technology and fossil fuel infrastructure if other more benevolent forms of energy are available and will help mitigate Climate Change. On November 17, 2016, Politico published an article about America's First All-renewable-Energy City, Burlington, Vermont. (See attached <http://www.politico.com/magazine/story/2016/11/burlington-what-works-green-energy-214463>)

Besides the serious detrimental impacts of increasing fossil fuel use on climate change, there are all the local and downstream impacts on land use, property values, quality of life along the Hudson River as well as the health of the River itself that must be taken into account. Many of these impacts after spills and accidents happen will be irreversible. Therefore we implore you now to practice the precautionary principal, to do no harm and do a comprehensive environmental impact statement and public hearings on any proposals before any decision is made on this proposal to allow the building of additional anchorage grounds for commercial vessels in the Hudson River.

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