

The Board of Commissioners of Pilots of the State of New York (“Board”) submits the following comments regarding the Advance Notice of Proposed Rulemaking (USCG 2016-0132) contemplating the establishment of new anchorage grounds in the Hudson River. For the reasons outlined below, the Board supports the establishment of new anchorage grounds.

The Board is a public agency created by the New York State Legislature to provide for the training, licensing and regulation of State licensed ship pilots. New York State Pilotage districts under the responsibility of the Board include the Hudson River from Yonkers, New York to Troy, New York.

The Hudson River Channel is 600 feet in width from New York City to Kingston, then 400 feet wide to Albany. This narrow width limits locations where vessels can safely anchor without impeding traffic in the navigation channel.

Federally designated anchorages have been established off Yonkers and Hyde Park. The Hyde Park Anchorage was established in 1996, in conjunction with the creation of the Mid-River Pilot Station. This anchorage provides deep draft, ocean-going vessels a location to anchor while awaiting daylight and favorable tidal, weather and/or ice conditions before proceeding to the Port of Albany or other terminals in the upper Hudson River.

The Hyde Park Anchorage is the only federally designated anchorage above Yonkers and the last location for ocean-going vessels to anchor before transiting the narrow reaches of the upper river. It is, therefore, imperative that this anchorage have suitable space for these vessels at all times and in all conditions. Concern exists that should additional anchorage areas not be established in the lower to mid-river, the Hyde Park Anchorage will become overcrowded thus preventing ocean-going vessels from having a suitable location for anchoring and, thereby, creating an unsafe condition.

The Hudson River, in addition to ocean-going vessels, serves as an important waterway for tug and barge traffic. While much of the traffic consists of the traditional tugboat towing or pushing barges loaded primarily with aggregates or scrap metal, an increasing number of Articulated Tug Barge (“ATB”) units now navigate on the Hudson River. These ATB’s, loaded with petroleum products, can be 600 feet in length with drafts as deep as some ocean-going vessels, and like the ocean-going vessels, these ATB’s require suitable locations throughout the River for anchoring in all weather conditions, day or night, when necessary. Additionally,

investments being made in facilities by the Port of Albany and other Hudson River terminals to attract more cargo indicate that commerce on the Hudson River will continue to grow. Given the amount and type of tonnage currently moving on the Hudson River and the probability of increased economic activity, the need for additional safe anchorages becomes even more critical.

Based on the foregoing, and in furtherance of navigational and environmental safety, the Board recommends the United States Coast Guard to approve the establishment of additional federally designated anchorages in the Hudson River.

Board of Commissioners of Pilots
of the State of New York

A handwritten signature in black ink, appearing to read "F. W. Keane". The signature is written in a cursive, flowing style with a large initial "F".

Frank W. Keane
Executive Director and Board Secretary