

**Adirondack Mountain Club · Mayor James E. Calnon, City of Plattsburgh, NY ·  
Environmental Advocates of New York · Lake Champlain Committee ·  
National Wildlife Federation**

December 6, 2016

Via Email: [craig.d.lapiejko@uscg.mil](mailto:craig.d.lapiejko@uscg.mil)

Mr. Craig D. Lapiejko  
Waterways Management Branch Coast Guard First District

Re: Coast Guard soliciting comments on proposal to establish more anchorage grounds for commercial vessel in the Hudson River  
Docket #: USCG-2016-0132

Dear Mr. Lapiejko:

We write to express opposition to the proposal to establish new anchorage grounds on the Hudson River. The proposal has several direct negative impacts to the Hudson River. These impacts – including reindustrializing the Hudson River, disturbing the river bottom, creating air, noise and light pollution along the river, and negatively impacting local communities – alone caution against allowing these new anchorage grounds.

The tug and barge industry requested additional anchorages in part to support an increase in crude oil transport. Indeed, forty-two of the 43 berths are designated as “long-term.” As such, there is substantial concern that the Hudson River could become a parking lot for barges transporting crude oil. Increased crude oil storage could lead to increased oil transit by train through many communities and resources in northern and western New York, including more oil transport along Lake Champlain.

Thus, the impacts of potential increase oil train traffic to these communities must be considered. Already, up to 30 million gallons of crude oil is traveling each week along aging rail lines and bridges that hug Lake Champlain and traverse the Adirondack region and the Hudson Valley. At a time when communities along this route are seeking to reduce and remove the threat of a dangerous oil train accident and resulting explosion and/or spill that could cause serious harm to the people and resources of this region, adding barge storage along the Hudson River that could create additional capacity to carry oil through this treasured region poses significant risk of adverse impacts.

For instance, the Lake Champlain region provides drinking water for nearly 200,000 people, generates nearly \$4 billion in tourism revenue, and contributes more than \$200 million in annual fishing related revenue. It serves as healthy waters for fish and thousands of migratory waterfowl, has hosted culturally-based recreation going back centuries, and is the future of the region’s vibrancy.

If the Coast Guard decides to move forward with the project, it should conduct a full environmental review including the performance of an Environmental Impact Statement that considers the impacts of increased oil-by-rail traffic, including risks and impacts to Lake Champlain and impacted communities in northern and western New York.

Thank you for your consideration.

Sincerely,

Adirondack Council  
Adirondack Mountain Club  
Mayor James E. Calnon, City of Plattsburgh, NY  
Environmental Advocates of New York  
Lake Champlain Committee  
National Wildlife Federation\*

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\* Please direct correspondence to Jim Murphy, Senior Counsel, National Wildlife Federation, 149 State Street, Montpelier, VT 05602; [jmurphy@nwf.org](mailto:jmurphy@nwf.org); 802-552-4325