August 29, 2016

Mr. Craig Lapiejko,
Waterways Management Branch
US Coast Guard, First District
408 Atlantic Avenue
Boston, MA 0210

Re: Proposed Anchorages on the Hudson

Dear Mr. Lapiejko,

The Palisades Parks Conservancy was founded in 2002 as the non-profit partner of the Palisades Interstate Park Commission (PIPC). Our mission is to support and protect the natural and cultural resources of the parks and historic sites of the Palisades Interstate Park system, while raising public awareness and supporting educational opportunities about the parks' national heritage. The PIPC annually hosts more than five million visitors in NY and NJ.

In order to fulfill the mission with which we are charged, the Palisades Parks Conservancy finds it necessary to express our concern over potential plans to allow for increased commercial anchorage in the Hudson River.

Our concerns are as follows:

- The Palisades Interstate Park Commission operates three recreational boating facilities within its parks. These facilities provide unique recreational opportunities to the public. The Conservancy feels that these facilities will be negatively impacted by numerous large anchored vessels nearby in the Hudson River and lead to loss of funding that is necessary to the continued operation of these sites.

- The Yonkers anchorage site is in view of the National Natural and Historic Landmark Palisades of the Hudson. The Palisades Cliffs were recently the subject of multiple lawsuits that focused on the importance of view sheds and scenery to the public's enjoyment of their parks and to their overall quality of life. These recent lawsuits were decided in favor of plaintiffs, who sued to stop LG Electronics from building a new corporate headquarters that would harm the scenic character of the Palisades. It is the opinion of the Conservancy that the proposed anchoring of barges so near the Palisades runs contrary to the spirit of this ruling.
- Upriver, the proposed mooring locations at Montrose Point, Tompkins Cover, and Newburgh would also be visible from National Historic and Natural Landmarks, state parklands, American Revolutionary War battlefield sites, and the first publicly-owned historic site in the nation—Washington’s Headquarters in Newburgh. Each of these sites will be impacted negatively by the mooring of barges in the river.

The Conservancy recognizes the significance of providing safe places for barges to moor and the importance of the Hudson River to shipping and our regional economy. However, we strongly urge the Coast Guard to balance the commercial interests represented by the Maritime Association with the interests of recreational boaters up and down the river, park users in the Hudson Valley whose river views will be diminished, and with the interests of the public at large.

The Conservancy also is concerned with the potential for catastrophe represented by the storage of thousands of barrels of fuel oil in the River. The potential for spillage, while potentially small, is significant and would be disastrous for multiple rare species including the endangered Atlantic Sturgeon. In addition, a spill of fuel oil would dramatically set back ongoing efforts to clean up the Hudson River and make it accessible to the public and a focus of our regional economy.

Further, the Conservancy is concerned believe that the Hudson River’s value to recreational boaters and their safety will be severely impacted by the presence of large barges at anchor in the areas proposed by the Maritime Association. We urge the Coast Guard to undertake a thorough study that takes into account the issues mentioned above.

We assert that allowing operators to anchor in the river outside of the existing federally-recognized anchorages defies the interests of the greater community of the Hudson Valley in favor of the commercial interests of shipping companies and the Maritime Association.

For these reasons, we are opposed to the proposal by the Maritime Association and urge the Coast Guard to reject the planned anchorages for the reasons cited above.

Sincerely,

Joshua Hyman, President
On behalf of the Board of Directors of the Palisades Parks Conservancy, Inc.