NYSOA on Coast Guard proposal for additional barge anchorages on the Hudson River Comments submitted (via online form) December 2016

I am writing on behalf of the New York State Ornithological Association, Inc. regarding the proposed establishment of anchorage grounds for commercial vessels in the Hudson River. Our organization is the umbrella group for bird clubs and several Audubon chapters in the state, including a number in and near the Hudson Valley. We have 500 individual members and 42 member organizations across NY State.

The Hudson River is frequently visited by our members and member organizations to seek bird viewing. It is one of the premier areas for both birds and birders in the state, and beyond. The Hudson has had a long history of abuse from chemical and wastewater pollution, and despite extensive efforts to clean up the river, lingering pollution remains, threatening wildlife and human health.

Any proposal that may increase risk to the Hudson River should be given the greatest scrutiny and allowed to proceed only if there is clear evidence that the dangers that have plagued the river in the past will not return. It is apparent that many of the vessels that would use these anchorages will be carrying petroleum products, including crude oil. The history of oil production and transportation on water is littered with horror stories, from the Exxon Valdez to the Deepwater Horizon. Birds are one of the main casualties of these events, with hundreds of thousands of oiled birds dying. The indirect impacts from habitat destruction and food chain impacts are just as significant.

The anchorages and oil barges are not the only threat to the Hudson from the increased flow of petroleum through this corridor. Rail lines adjacent to the river are carrying more of these materials, also posing the risk of a spill.

With the currents and tides of the Hudson River, it is unlikely that a major spill could be contained. The marshes and wetlands that make up much of the riverside habitat are particularly vulnerable. The value and importance of these areas to waterfowl, wading birds, shorebirds, eagles and other species cannot be overstated. This is irreplaceable breeding, feeding and migratory habitat for these birds, many of which are already at risk.

Given present technology and both past and recent history, it is very unlikely that the increased traffic these anchorages would bring would not increase the dangers to the Hudson River, its wildlife—including birds, and the thousands of people who live along it.

We urge the Coast Guard to give this proposal its highest level of review and public participation and at a minimum require a full environmental impact assessment of the potential effects of present and increased ship traffic and anchorage on the Hudson River.

Andrew Mason NYSOA Conservation Chair