Chelsea
Yacht
Club
Box 180 Chelsea, New York 12512

August 5, 2016

Mr. Craig Lapiejko
Waterways Management Branch
Coast Guard First District
408 Atlantic Avenue
Boston, MA 02110

Re: Proposed Rulemaking:
Anchorage Grounds, Hudson River; Yonkers, NY to Kingston, NY
Docket Number USCG–2016–0132

Dear Mr. Lapiejko:

We are writing to express our concerns with the above-referenced proposed rule which would establish ten new anchorage grounds along the Hudson River between Yonkers, NY and Kingston, NY.

Chelsea Yacht Club's Interest in the Proposed Rule

Chelsea Yacht Club is located on the east bank of the Hudson River approximately two miles north of the Newburgh-Beacon Bridge. Our facilities include a mooring field, boat ramp and launching pit. A Submerged Land License from New York State authorizes up to 140 moorings in our mooring area. Members' boats range in size up to 36 feet overall length.

Weekly sailboat races are held in the vicinity of Chelsea Yacht Club. Notice of these sailboat races is published in the Local Notice to Mariners for District 1 (*see, e.g.*, LNM 22/16 and 23/16, regarding sailing regattas to be held on the Hudson River in the vicinity of Newburgh NY). The Coast Guard has approved six buoys located in the vicinity of Chelsea Yacht Club. These buoys are used as racing aid marks, and three are lighted buoys which also mark the western boundary of our mooring area.

One of the proposed new anchorage grounds, the Roseton anchorage, is to be located directly west of Chelsea Yacht Club. Specifically, the eastern boundary of the Roseton anchorage is only a few feet west of the lighted buoys marking the western boundary of our mooring area. The attached map shows the proposed location of the Roseton anchorage relative to our approved lighted buoys "W", "S" and "N" and unlighted buoys "I", "J" and "D".

Also in the vicinity of the proposed Roseton anchorage is a pipeline which extends from the eastern shore of the Hudson River near the Castle Point Veterans Administration hospital. This pipeline is not associated with Chelsea Yacht Club. The pipeline is marked with a series of buoys just south of and extending westward beyond our "W" buoy. These pipeline buoys are shown on NOAA Chart 12343 as a series of five buoys identified as "5 W Or Fl(2) 5s Priv." Because these pipeline buoys extend westward beyond our "W" buoy, it appears likely that the pipeline marked by these buoys extends into the proposed Roseton anchorage.

Navigational Impacts of the Proposed Roseton Anchorage

The stated purpose of this proposal is that "anchorage grounds may improve navigation safety along an extended portion of the Hudson River … allowing for a safer and more efficient flow of vessel traffic." We argue that the proposed Roseton anchorage will impede navigation safety for the following reasons.

The southeast corner of the proposed Roseton anchorage lies just northwest of the R "52" buoy, a Coast Guard ATON north of the Newburgh-Beacon Bridge which marks the eastern boundary of the Hudson River channel. The Roseton anchorage therefore lies entirely within the channel in this stretch of the river. Furthermore, the Roseton anchorage would cover approximately 305 acres, with a width of approximately 3500 feet. The Roseton anchorage therefore will occupy a majority of the channel in this stretch of the river. With such a significant portion of the navigable channel occupied by anchored commercial vessels, we fail to see how this particular proposed anchorage will "improve navigation safety."

Moreover, as the proposed Roseton anchorage is located alarmingly close to our mooring area, we have grave concerns about the hazards that anchored commercial vessels may pose to members' boats in our licensed mooring area. The Coast Guard proposal contemplates the Roseton anchorage will accommodate up to three vessels with a swing radius of approximately 1700 feet for each vessel. As the width of the anchorage is approximately 3500 feet, this vessel swing radius will result in anchored commercial vessels swinging dangerously close to our moored boats.

The alarming proximity of the Roseton anchorage to our mooring area and launch ramp would also pose a navigational hazard to members' boats traveling to/from the mooring and launching areas. Anchored commercial vessels may block access to navigable portions of the Hudson River to the west of Chelsea Yacht Club, and would force members to travel either to the north end of our mooring area, or south to R "52", before being able to access navigable portions of the Hudson River. During times of a strong ebb or flood current, traveling north or south such distances may prove impossible for some members' boats, essentially cutting off access to the River for these boaters.

Impacts to Education and Racing Programs

Sailing education programs are conducted at Chelsea Yacht Club throughout the boating season. During the summer months, up to 25 children per week participate in our Youth Sailing Program, which provides an opportunity to experience the joy of sailing, to learn about and appreciate the marine environment and to develop lifetime skills through sailing instruction. Youth Sailors learn boat handling, seamanship and water safety, and develop self-confidence, respect for wind, water and the environment and team skills while sailing single-handed boats and as skipper or crew on two and three-person boats. On weekends in the spring and fall, our Adult Sailing Program bolsters water safety skills, basic to advanced boat handling and racing skills, and seamanship. Chelsea Yacht Club also has an active club racing program, with races held Sunday afternoons, Wednesday evenings, and some Saturdays. Up to 25 boats participate in each race.

These racing and education programs are open to both members and the public, and serve to encourage recreational sailing on the Hudson River, promote boating safety, and provide access to the river. With the proposed Roseton anchorage blocking access to navigable portions of the Hudson River to the west of Chelsea Yacht Club, this anchorage would likely have a devastating effect on the vitality of these programs.

Environmental Concerns

The proposed Roseton and other anchorages have the potential to result in significant environmental damage to the Hudson River estuary. The Hudson River provides habitat and spawning ground for many fish species, including two federally endangered species of sturgeon. Anchoring of

large commercial vessels with heavy ground tackle would cause significant damage to the river bottom habitat.

We are also concerned about the potential use of the proposed anchorage areas by vessels carrying crude oil or refined petroleum products. The increased presence of such vessels would necessarily increase the Hudson River's exposure to pollutants and the risk of a spill which would harm the ecosystem, eliminate our ability to use the river in the affected area, and potentially impact other commercial traffic.

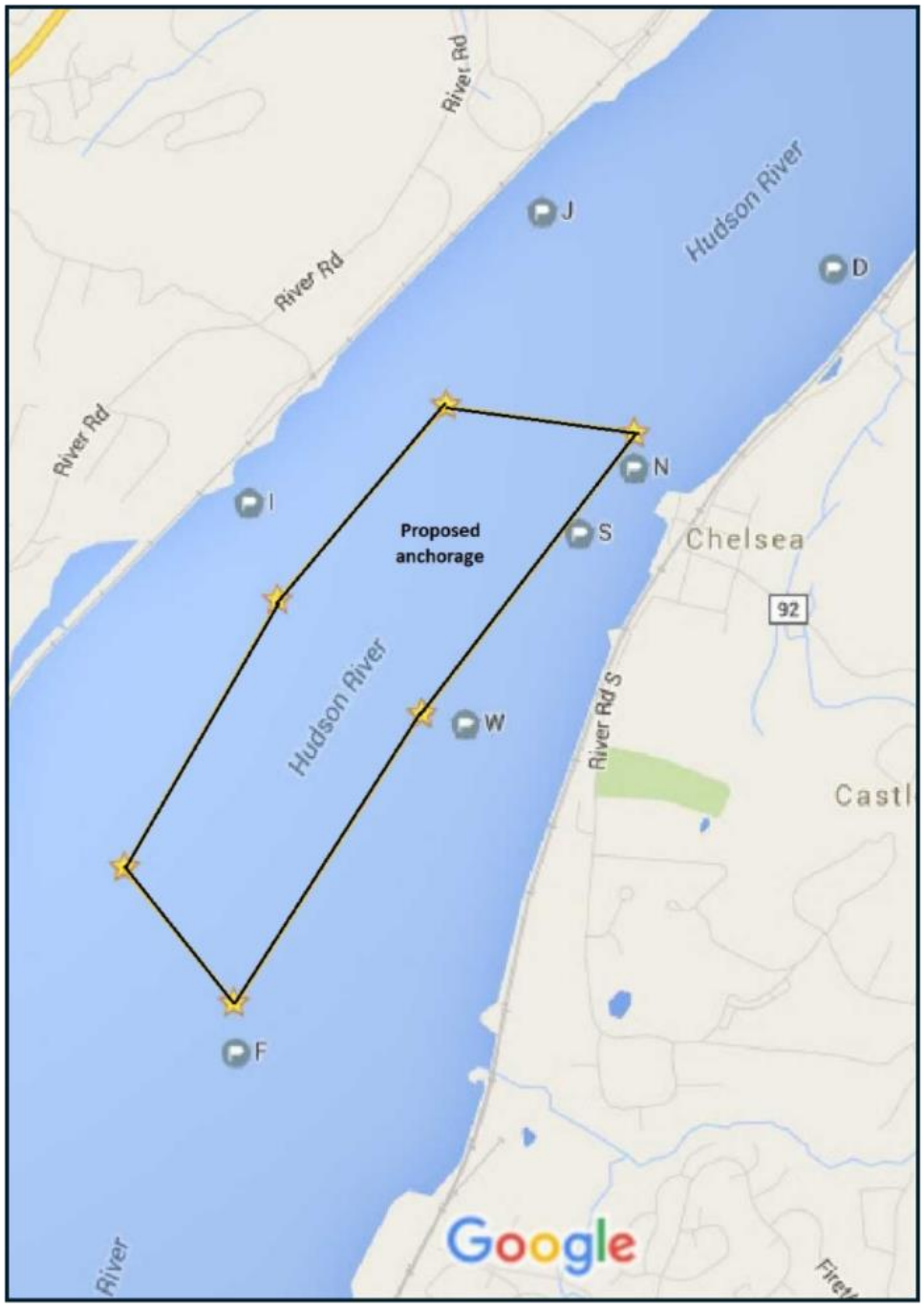
Community Impacts

Chelsea Yacht Club is located in the hamlet of Chelsea, a quiet residential community. Large commercial vessels anchored just off the banks of the Hudson River near Chelsea may cause significant noise and light problems. Communities located near other Hudson River anchorages have complained about "stadium lighting" on barges and generator noise throughout the night. Commercial vessels anchored near the Chelsea waterfront community are likely to create similar noise and light pollution, affecting residents' quality of life.

Conclusion

For the foregoing reasons, Chelsea Yacht Club opposes the Roseton anchorage ground in its current form, and we respectfully request reconsideration of the proposed rule.

Sincerely yours,

Bruce Cohen, Commodore

Proposed Roseton Anchorage Ground and Chelsea Yacht Club buoys W, S, N, D, I and J.
The buoys W, S, and N mark the western boundary of CYC's mooring area.
The buoy marked as F is "R" 52, a USCG ATON located north of the Newburgh-Beacon Bridge.