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November 21, 2016

The Honorable Jeh Johnson
Secretary of Homeland Security
Washington, D.C. 20528

Dear Secretary Johnson:

Request to Block U.S. Coast Guard's Hudson River Anchorages Proposal—Potential Terror Target

I am asking that you halt the rulemaking process of the U.S. Coast Guard (USCG) regarding proposed new anchorage grounds on the Hudson River (81 FR 37168; Docket Number USCG-2016-0132). Creating a 2,400-acre floating industrial storage area for massive barges loaded with millions of gallons of explosive, health-threatening chemicals is a pathway to potential disaster—for public health and safety, the environment and business interests—along this great American river. I respectfully request that you direct the USCG to discontinue the rulemaking process. To date, the USCG has simply issued an Advance Notice of Proposed Rulemaking, soliciting public comment. So far, over 4,000 comments have been received, with the overwhelming majority opposed to the proposal. My request is that you terminate the process before the formal rulemaking continues, upon the conclusion of the comment period on December 6 and before the transfer of power to a new administration.

Powerful opposition from leading officials, business groups and the public

Public comments expressing strong opposition to this proposal have come from virtually all of the Hudson Valley's environmental and business groups and the majority of mayors, county executives, and state and federal officials representing constituents affected by the plan. Congressman Sean Patrick Maloney has introduced legislation that would ban new anchorages along the river in response to the proposal.

Usually anchorages proposals involve one or two new berths. This request seeks to establish 10 anchorages with 43 berths along an approximately 80-mile stretch of the Hudson River. While the industry claims the request is based on enhancing safety, it's really about accommodating higher volumes of crude oil it expects to transport now that Congress has lifted the longstanding ban on exportation. The Maritime Association of the Port of New York/New Jersey admits that "trade [of crude oil] will increase on the Hudson River significantly over the next few years with the lifting of the ban...and federally designated anchorages are key to supporting trade."

The new anchorages would transform how the Hudson River is used for commerce—turning it into a parking lot for barges waiting to off-load crude at New Jersey, Canadian and overseas refineries. Significant threats include:

- By massing volatile crude oil—up to 64 million gallons in one anchorage—they present prime targets for terror attacks near major population centers, including Yonkers, New York's fourth largest city. Two of the new anchorages lie within three miles of the Indian Point nuclear power plant.
- The anchorages vastly increase the likelihood of a spill, which in the tidal Hudson would be difficult, if not impossible, to clean up without incurring immediate and long-term damage to drinking-water resources and prime wildlife habitat. The anchorages are immediately adjacent to or within the tidal flow of six drinking-water intakes. The region already lacks adequate spill-response safeguards.

- The anchorages could stall ongoing economic development projects along communities' riverfronts by contributing significant air, noise and light pollution.
- Finally, they would destroy the unique character of the Hudson Valley—and the foundation of its \$5.2-billion tourism economy—by desecrating world-class scenic treasures, including magnificent views of the Palisades and Hudson Highlands. They also would jeopardize strides made to provide safe access to and enjoyment of the river.

Major populations of the Hudson Valley would assume all the risk and receive no benefits

Hudson Valley citizens have made too many strides to protect our American Heritage River to see it turned into a crude oil superhighway for which we assume all the risk without receiving any benefit.

I am available to speak further with you about this—either by phone (914 489 4630) or in person at your convenience.

Thank you for your consideration and Happy Thanksgiving.

Sincerely,

A handwritten signature in cursive script that reads "Ned Sullivan".

Ned Sullivan
President