The Charles River Alliance of Boaters (CRAB) is a coalition of individuals and organizations that use the water sheet of the Lower Charles River, between the Watertown Dam and the New Charles River Dam. CRAB is comprised of 13 rowing boathouses, 4 sailing boathouses, 4 yacht clubs, a kayak/canoe/paddleboard rental vendor with two locations, and their more than 60,000 participants. In addition, there are 2 commercial tour boat operators and partnerships with environmental stewards. Originally started as an ad hoc confederation more than 25 years ago, we are an IRS-recognized non-profit today. Our mission is to encourage safe and accessible boating by the entire community on the Lower Basin of the Charles. This includes power boaters, sailors, rowers, paddlers, and others, working together to keep the Charles River a healthy resource for the enjoyment of boaters and park users alike.

The Lower Basin of the Charles River is likely the most active recreational waterway in the country. On a typical day, there are more than 5000 rowers, 500 sailors, and 500 paddlers somewhere on the water sheet. As the water quality has improved over the last 5 decades, recreational use has grown tremendously. As a community, we need to continue improving the quality of the water and the ecosystem of the river, as well as stormwater and flood management and climate resilience, so that the Charles River continues to be a crown jewel of recreational activity.

The bulk of river traffic in the area of the Throat are rowers in singles, doubles, fours, and eights. Additional traffic includes coaching launches, motorboats, kayaks, paddle boarders, and the excursion boats of the Charles Riverboat Company. Passage under the BU Bridge and Grand Junction Railroad Bridge is a bottleneck for this traffic. Any traffic travelling downriver or upriver needs to squeeze into a single file through an arch of the railroad bridge while avoiding any boats near the dock of the BU Sailing Center and BU Rowing Boathouse. Many rowers opt to turn around, rather than pass through the BU Bridge. Wide enough for an 8-person shell to pivot, the area west of the BU Bridge is used as a turning basin. The width of the river here also provides a safe place for smaller boats to move closer to shore as faster boats stay in the center.

Modified At-Grade Alternative

CRAB supports an at-grade design as the best way to accomplish the project goals while also respecting the concerns of the river user community. At the same time, CRAB feels that changes must be made to the current at-grade alternative under consideration by MassDOT so that it will not harm the users of the river.
Our principal concern is the intrusion of elements of the project into the water sheet along the Throat section between the BU Bridge and the River St Bridge. As presently designed, this alternative will require

- addition of approximately 600 sq ft of solid fill to support Soldiers Field Road;
- permanent narrowing of the watersheet by 40 ft;
- permanent impact on navigation due to narrowing of the watersheet;
- installation of 250 piles in the Charles River to support a bike and pedestrian boardwalk;
- approximately 29,000 sq ft of shading impacts from the boardwalk; and
- addition of approximately 20,000 sq ft of fill for a living shoreline.

CRAB has been, and continues to be, willing to consider modifications of the shoreline that might use a narrow ribbon of the water sheet along the throat if it would yield a better slice of park and pathway while penetrating into river shallows that we can't use. CRAB remains steadfastly opposed to any permanent structure that would extend so far as to interfere with existing use of the river water sheet. Reduction of the usable water sheet along the Allston shore will compress river traffic laterally and potentially create unsafe situations where rowers, paddlers, and powerboaters are vying to use the same space. Of particular concern are conflicts between downriver and upriver traffic. These compressed traffic situations are particularly acute for rowers who aren't facing the direction that they are travelling toward. The margin of safety can be further reduced due to limited visibility in the low-light conditions of early morning and evening when rowers are often on the water.

Any discussion of the Throat on the Allston side needs to be mindful of the potential to restore Magazine Beach and the potential impact on use of the water sheet on the Cambridge side and any further restriction to use of the watersheet. Some congestion is already caused by boats leaving the small boat launch at Magazine Beach, merging with other boats hugging the shoreline as they go upriver. If a public beach is built near the existing pool, it would likely extend 100 feet from the Cambridge shoreline, creating a major bottleneck, which would be made worse by any encroachment from the Allston shore.

For any structure extending into the river, CRAB is very concerned about the potential for injury to a person or damage to equipment due to contact with the structure. Think about people rowing backward and running into things. Any structure that would be at a height that could lead to head injuries would need to be off the table. That might force any Paul Dudley White walkway structure to be at least 10 feet off the water. Even with an elevated walkway, the piles supporting the walkway present a safety hazard to rowers. Such pilings should be located on the bank and not in the water. Please note that no analysis of the safety for users of the watersheet was included in the Attachment #1 Throat Area Alternatives Analysis.

Beyond the potential for injury, CRAB is concerned about the impact of putting a walkway on pilings in the river since it could further reduce flow and encourage further sediment build-up. Our recent depth chart shows a shallow region spanning the entire width of the river that has a maximum depth of nearly 8 feet. Compared to a survey done in 1922, this area is now 4-6 feet
shallower. **This area has lost 4-6 feet of water depth in the last hundred years.** While there is still nearly 8 feet of water there, sedimentation is clearly a threat.

CRAB is also concerned about any shoreline modification that could become a magnet for floating trash and maintaining the ability of the Cleanup Boat to access the shoreline and remove such trash. As currently designed, the Cleanup Boat would not be able to approach the shoreline to remove any trash that accumulated. Reconfiguring the PDW so that it is elevated and its pilings are out of the water would allow the Cleanup Boat to continue to remove trash as it piles up along the shoreline.

CRAB suggests that strong consideration be given to elevating the Paul Dudley White Path in the area of the Throat. While A Better City has suggested that the PDW could be cantilevered out over the water or over Soldiers Field Road, an additional possibility would be to elevate that PDW using single column pedestals as was done with North Point Bridge. This approach would reduce the number of pedestals by at least half and all the pedestals could be built on land and not intrude into the water.

The primary concern for power boaters is passage through the Boston-most arch of the Grand Junction Railroad Bridge. This bridge is the limiting vertical clearance of 13’6” for power boats on the river. Prior to the construction of the walkway under the railroad bridge, boats could more closely approach the Boston shore, where the vertical clearance is 3 inches higher. The impact was that several boats with flybridges that had been members of Newton and Watertown Yacht Clubs could no longer pass under the railroad bridge. Use of the Boston-most arch is also an important safety valve for rowers heading downriver, especially those going slower such as singles vs eights. CRAB favors removing the walkway and positioning the path on the other side of the bridge abutment.

As currently designed, 600 ft of fill are required to support the new Soldiers Field Road (SFR). The amount of fill and intrusion into the river can be reduced by more fully utilizing land made available by Boston University and by reducing the lane widths of SFR within the project to be consistent with the rest of SFR and Storrow Drive.

CRAB believes that reducing the overall number of traffic lanes in the throat area presents the best solution to all of these issues. This approach would allow for an at-grade version of the project without intruding into the Charles River, creating enough space along the river for cyclists and pedestrians as well as river bank restoration. The traffic data presented by MassDOT justified a fourth lane in I-90 only during 1.5 hours of the eastbound morning commute. The resources that would have been spent to rebuild the same number of roadway lanes should be diverted to enhance mass transit which would lead to fewer cars on the road.

CRAB is encouraged that MassDOT has indicated that the river bank can be stabilized using natural materials and native vegetation. Since it would reduce wake bounceback, a sloping bank would be an improvement over the existing shoreline. An important consideration in this project should be the reduction of erosion, sediment and stormwater run-off, loading of nitrogen,
phosphorus, and other undesirable nutrients. After decades of improvement in water quality, attention should also focus on restoring and supporting better aquatic habitat. An important aspect of this should be the re-establishment of the natural ecological balance with aquatic flora and fauna by supporting and protecting nursery and feeding habitats of fish, bivalves, worms, and insects.

The Modified At-Grade Alternative provides for the best potential connection between the river and BU and Allston. The “potential future pedestrian and bike connection” from Babcock St and Harry Agganis Way to the river park and the PDW is woefully inadequate. As currently envisioned, it is a long narrow fenced path across 12 lanes of roadway and 4 railroad tracks. That's a long distance in a narrow space. A lot of people would not view it as particularly safe and so it would be little used. A better connection would be a broad elevated greenspace from BU to an elevated PDW. Think of the Brooklyn Heights Promenade and the NYC High Line with a broad elevated connector similar to what was done for the Gateway Arch in St. Louis. That would give the community a real connection between BU and the river while providing valuable greenspace.

Soldiers Field Road Hybrid Alternative

Our biggest concern with the Soldiers Field Road (SFR) Alternative is the plan to build a “temporary” trestle in the river for 8 to 10 years, reducing the width of the river by 110 feet. This “temporary” structure has all the safety concerns of the Paul Dudley White path over the water that we discussed earlier. To repeat, CRAB is very concerned about the potential for injury to a person or damage to equipment due to contact with the structure. Reduction of the usable water sheet along the Allston shore will compress river traffic laterally and potentially create unsafe situations where rowers, paddlers, and powerboaters are vying to use the same space. Of particular concern are conflicts between downriver and upriver traffic. These compressed traffic situations are particularly acute for rowers who aren’t facing the direction that they are travelling toward. This was discussed in detail at two “town hall” meetings of CRAB and MassDOT.

The pilings of the “temporary” trestle present additional concerns about potentially reducing water flow and increasing sedimentation. Even though the project calls for the river bed to be returned to its original state, we are concerned that sedimentation might occur outside of the project boundaries and not be remediated.

In the SFR Hybrid Alternative, the “potential future pedestrian and bike connection” from Harry Agganis Way to the river park and the PDW is woefully inadequate. As currently envisioned, it is a long narrow fenced path across 12 lanes of roadway and 4 railroad tracks. That's a long distance in a narrow space. A lot of people would not view it as particularly safe and so it would be little used.
CRAB does not support the Soldiers Field Road Hybrid Alternative since other viable options to complete the project exist.

**Modified Highway Viaduct Alternative**

While the Modified Highway Viaduct Alternative may have the least impact on the Charles River, it is the worst of the alternatives for the community at large. It continues the elevated viaduct roadway that currently exists, without the S-turn on I-90, that divides Allston and the area near BU from the river.

CRAB does not support the Modified Highway Viaduct Alternative.

**Conclusion**

The Allston Multimodal Project has brought a lot of attention to how to squeeze automobile, train, bicycle, and pedestrian traffic into a narrow ribbon along the edge of the Charles River between the BU Bridge and the River St. Bridge, the so-called “Throat”. Many of us in the boating community on the Charles River would like to see improvements to the roadways and the Paul Dudley White (PDW) pedestrian/bicycle path along the Charles River. We live in the community and experience the shortcomings of the current roadways and PDW path like everyone else. While CRAB supports an at-grade design as the best way to accomplish the project goals while also respecting the concerns of the river user community, we feel that the following changes must be made to the current at-grade alternative under consideration by MassDOT so that it will not harm the users of the river.

- Elevate the Paul Dudley White Path along the Throat and site all the pilings on the shore;
- Remove the walkway under the BU Bridge and reposition the path on the other side of the bridge abutment;
- Push Soldiers Field Road further from the water edge by reducing lane widths to be consistent with the rest of SFR and Storrow Drive AND more fully utilizing land made available by Boston University;
- Reduce the number of lanes of I-90; and
- Construct a sloped living shoreline with natural materials and native vegetation.

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