



## CHARLES RIVER ALLIANCE OF BOATERS

March 2, 2021

Alex Strysky,  
Environmental Analyst, MEPA Office  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Re: Comments on North Allston Storm Drain Extension Project (EEA No. 16319) Environmental Notification Form

Dear Mr. Strysky:

The Charles River Alliance of Boaters (CRAB) is a coalition of individuals and organizations that use the water sheet of the Lower Charles River Basin, 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 75,000 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 proposed North Allston Storm Drain Extension Project (NASDEP) involves construction of a new outfall on the western bank of the Charles River between the Western Avenue Bridge and the River Street Bridge. The proposed drain will redirect runoff from the 164 acre catchment area located on the south side of Western Avenue that currently discharges to the Charles River north of Western Avenue via two outfalls. The culvert will extend into the river, below the surface, tapered to match the profile of the existing bank with a stabilization mat extending further into the river to prevent scouring. This drain structure itself will not interfere with boating activities. However, we do have several concerns about other aspects of this project.

Our primary concern is the effect of this new drain on the environment of the Charles River with a potential increase in sediment, floating trash, oil, and other pollutants entering the river through this new storm water drain.

The inclusion of a hydrodynamic separator is a good first step to remove sediment, but it will still allow 20% of the suspended solids to pass through to the river. And that's the best case scenario which assumes dutiful and proper maintenance of the drainage system. We would like to see a commitment from BWSC to vigilantly maintain catch basins throughout the drainage area. We also encourage BWSC to upgrade the drain to include stoplogs to facilitate better routine maintenance. The track record of various agencies to maintain the outfalls in the river is abysmal, and while many of the outfalls are the responsibility of agencies other than BWSC, past performance does not generate confidence. As an example, two outfalls near the proposed drain have significant sedimentation: the Western Avenue local drainage (just north of the Western Avenue Bridge on the Boston side) and the Smelt/Salt Creek Drainage (south of the River Street Bridge). The Smelt/Salt Creek Drainage is also a source of floating trash. Further downriver, a broad sandbar has formed at the mouth of the Muddy River and Shady Brook, where an area of 100 ft by 200 ft is less than 3 feet deep. Upriver at Faneuil Brook, the Commonwealth spent nearly a million dollars in 2016 to remove a sandbar that occupied half the river width and that sandbar is already rebuilding.

The statement by the project engineer, during the public meeting of 23 February, that floating trash would not be able to flow into the river is less than reassuring. While much trash would be screened by the individual catch basins, some will still enter the drain. With the turbulence associated with high flows, we would expect that this trash could easily enter the river, despite the culvert being under the surface of the river. Beyond the stipulation that BWSC is, and would be, compliant with the BWSC Stormwater BMP Recommendations Report approved by the EPA [footnote 2, page 7 of the ENF], there is no detail how this would be achieved. Furthermore, there is no discussion how the anticipated development of the Harvard Enterprise Research Campus will increase the stormwater runoff, and associated sediment, trash, and other pollution, and how such stormwater would affect the river.

As detailed on page 9 of the ENF, the proposed construction period is 24 months. It is assumed that obstructions in the river, including the coffer dam, the silt curtain, and project barges will be present much of that time period. Given the impact of these obstructions on the boating community (see below), we ask that strong consideration be given to shortening the proposed construction period through the use of accelerated construction methods. Shortening the time that the coffer dam and silt curtain are in the water would benefit the boating community.

In the third paragraph on page 9, the ENF states that "There will be no interruption to waterway users and navigation will be maintained throughout construction on the Charles River." In response to a question about the size and position of the silt curtain, one of the project engineers offered that "In this area, the river is about 340 feet wide so there will be ample room for river traffic to navigate." Furthermore, traffic analysis was done for traffic on the roadways as well as the Paul Dudley White Path, but it was merely assumed that the project would have minimal impact on boating. This perspective does not reflect the potential impact of the project on boating activities.

The section between River Street and Western Avenue is one of the busiest sections of the Charles River. Nearly every rower passes through this section every time that they are on the river. That's 5000 rowers, and nearly 100 boats, passing by the construction zone, twice, upriver and downriver, every day, typically in the early morning or late in the day. Add in a few dozen power boats and hundreds of kayakers throughout the day, and it's a busy active space. To manage all this activity, the Charles River

Alliance of Boaters has a traffic plan, initially developed 20 years ago and regularly updated. In the traffic plan, there are essentially three lanes, one for upriver rowers, one for down river rowers, separated by a bi-directional lane for power boaters. Most of the river bridges, including River Street and Western Avenue, have three arches so each lane is assigned an arch. This traffic pattern has been a key to our success in maintaining a high level of safety as traffic volume has exploded over the past decade. Keep in mind that rowers are travelling forward while facing backwards; lateral spacing to accommodate this is an important factor in our safety and traffic plan.

The coffer dam, silt curtain, and barges needed to build NASDEP are obstructions that would require that traffic compress laterally, reducing the safety margin. While rowers that are merely practicing can adapt, that section of the river is also the location of a 1200-meter race course, an arrow-straight course from south of the River Street Bridge to North of the Western Avenue Bridge. The lane through the Boston arches allows boats to travel downriver while this race course is being used. This section of the river is also used for other events, including the Head of the Charles Regatta and Riverside Boat Club's annual Cromwell's Cup.. CRAB can work with BWSC to modify our activities, but it requires more discussion than has happened to date.

On page 8, the ENF states that for a design storm of 5.2 inch rainfall in 24 hours, the peak aggregate discharge rate will increase from 247 cfs to 392 cfs, and the peak aggregate flood rate would decrease from 480 cfs to 331 cfs, while the total flood volume would be cut in half. How will the increased discharge rate affect current and water flow in the Charles River? Will this adversely affect boaters, especially rowers and kayakers? While it might be assumed that boaters would not be using the Charles during and immediately after such an extreme rain event, what would be the consequence of smaller rain events where boaters are still likely to be using the Charles River? It is disappointing that no such consideration was included in the ENF. It leaves us not knowing how the water flow from the NASDEP might affect boaters.

Given the potential for increased discharge into the river, especially with the anticipated new development of the Harvard Research Enterprise Campus, we feel that the project should execute an Environmental Impact Report. We ask that MassDEP require such a review and that it address the following:

- The impacts of increased flows on the Charles River and those who use the river;
- Future water quality conditions, including impacts from climate change and increased discharges to the Charles River;
- Compliance with water quality requirements, including how the project will comply with the Charles River nutrient TMDL and Charles River pathogen TMDL, and the BWSC NPDES permit for stormwater discharges;
- Construction period impacts, including staging and dewatering;
- Operation and maintenance of the proposed drainage system; and

It should be obvious from the unanswered questions posed in this letter, that there are details of this project and its potential impact that could benefit from a more thorough public comment process.

Submitted to alexander.stryisky@massmail.state.ma.us on March 2, 2021.