



Charles River Watershed Association

By Fax and Mail

June 21, 2007

Ben Lynch, Program Chief
Waterways Regulation Program
One Winter Street, 5th Floor
Boston, MA 02108

Re: Chapter 91 Waterways License Application Number W07-1957, 100 Bridge Street, Dedham, MA for the Construction and Maintenance of a Crew Dock and Gangway in the Charles River

Dear Mr. Lynch:

The Charles River Watershed Association (CRWA) has reviewed the application for a Chapter 91 license by the Dexter School for the above-referenced project. With over 5,000 members, CRWA works to protect and restore the Charles River and its watershed.

The Charles River reach flowing through the project site provides over 14 miles of unimpeded flow from the Cochrane Dam to the Silk Mill Dam and is frequently boated, fished and otherwise publicly enjoyed. There is only one sizable dock in this area of the River, belonging to the Noble and Greenough School in Dedham, approximately 2.5 miles upstream of the project site in the "Dedham Loop" section of the Charles. The school is currently operating 12, 4 person rowing sculls from April to May as part of their varsity, and junior varsity rowing programs.

CRWA promotes public use and enjoyment of the river and we are concerned with the growing number of requests for new private docks, and particularly rowing docks, along the river. If every college and high school in the area were allowed to have its own dock, the river would look far different, river bank in many areas would be permanently altered, water sheet traffic would be increased in areas that previously primarily accommodated kayaks and canoes, and the public's enjoyment of the river considerably lessened. One of the reasons CRWA supported a large facility and docks for Community Rowing, Inc. was so that individual rowing facilities would not proliferate. The cumulative impacts of private docks over time will detract from the functionality and beauty of this public resource.

The Department should require additional information from the Dexter School describing its crew program, its size, operating months and hours and the possible alternatives to constructing a rowing facility in this area, including utilizing existing private schools and colleges' boathouses and docks. Dexter School should also discuss the feasibility of joining with other schools on the

use of dock in this location. The public benefits that could be provided from the Dexter School's program should be discussed. Public access through the site along the river and on the dock should be license terms. A public boat launch should also be required and access to public restrooms provided.

Design specifications have the 150-foot dock extending 30 – 40 feet into the river with a gangway, and brackets affixing the dock to the riverbank. Steel piles will support the dock. The Department should require an analysis of alternative dock configurations that minimize water sheet encroachment and riverbank habitat loss.

The dock, as currently designed, will alter 150 feet of contiguous riparian corridor which provides habitat, temperature regulation, stream bank stability and buffering of contaminants from the adjacent parking lot during storm events. The Dexter School should be required to restore and enhance on-site and nearby degraded streambank as part of mitigating riparian corridor impacts and should control stormwater runoff from the site with best management practices that include recharge of treated stormwater.

Due in large part to CRWA's efforts to improve Charles River water quality, the Charles meets state bacteria swimming standards fairly consistently in this area and CRWA is working with the Department of Conservation and Recreation and state legislators to reopen Havey Beach, which is located approximately ½ mile downstream of the proposed dock, for swimming. This will be a significant milestone toward meeting the River's designated uses pursuant to the state water quality standards. CRWA is concerned that a rowing facility, which by its nature has fast moving boats, at Bridge Street will conflict with this use and with other water craft that use this area.

Please feel free to contact me if you have any questions or need any additional information at 781-788-0007 ext. 224.

Sincerely,

David S. Kaplan
Environmental Scientist
Charles River Watershed Association

cc: Dedham Conservation Commission
Dan Driscoll, DCR
Representative Michael Rush