



August 26, 2020

Via Electronic Mail

Ms. Delia Kaye, Director
Concord Natural Resources Commission
141 Keyes Rd
Concord, MA 01742

RE: Comments on Proposed Fenn School Seasonal Floating Dock

Dear Ms. Kaye,

On behalf of the River Stewardship Council (RSC) of the Sudbury, Assabet and Concord Wild and Scenic River, thank you for the opportunity to comment on the proposed seasonal floating dock on the Concord River at 676 Monument St. Concord (The Fenn School).

Concord has a unique and special resource in the Sudbury, Assabet and Concord Wild and Scenic River. In 1968, Congress passed the Wild and Scenic River Act to protect designated rivers and their unique characteristics in their free-flowing condition, for the enjoyment of present and future generations. Nationally, less than 1% of rivers are designated as Wild and Scenic. Twenty-nine miles of the Sudbury, Assabet, and Concord Rivers were designated into the National Wild and Scenic River System under Public Law 106-20 on April 9, 1999. The rivers were designated for their free-flowing condition, water quality and their outstandingly remarkable values (ORVs) including ecology, recreation, scenery, history and culture, and place in American literature. Comprised of representatives from local, state and federal governments, as well as local NGOs, the RSC coordinates the protection and enhancement of the Wild and Scenic River segments and their associated outstandingly remarkable values.

The RSC is supportive of increasing opportunities for local students to have immersive recreational and educational experiences on the river, but the RSC has some concerns about the project, mainly the scenic impacts of the dock and its protrusion into the river channel. We offer the following comments on the proposed dock:

- The current proposed 144 sq ft dock will impact the scenic value of the Concord River. The RSC encourages a smaller dock at this site to lessen the impacts on the river's scenic values. We are also concerned that this project may set a precedent for the construction of other impactful large private docks on the Wild and Scenic River.
- The upstream end and outer edge of the dock should remain as close to the shoreline as possible to allow for users to safely load/unload canoes while minimizing the structure's impact in the river channel.
- The RSC requests that a cross section of the channel/bathymetry be completed in order to make sure that the dock would not be impinging on the movement of other boats, specifically those deeper in the water than canoes and kayaks (e.g., smaller outboard motor boats).
- The Fenn School should prepare for and have a plan in place for securing or removing the dock during hurricanes, tropical storms, and other high-flow events.

- Wood rather than aluminum decking is preferred on the gangway and the dock. This would better align with the river's scenic values.
- The standard aluminum railing proposed for the gangway is visually obtrusive and does not align with the scenic values for which the river was designated. The RSC encourages the use of rope, covered wire, painted railings, or other less obtrusive and more visually appealing railings on the gangway.
- The dock, ramp/gangway, and railings should be natural, earth toned colors to blend in with the river environment.
- The diameter of the dock support poles in the river should be minimized to the greatest extent possible to lessen the disturbance of the riverbed and to limit their visual impact.

The RSC also welcomes the opportunity to partner with The Fenn School to expand on-river recreational and educational opportunities with students and summer program participants.

Thank you for your consideration of our comments.

Sincerely,

David Witherbee, Concord Representative
Sudbury, Assabet, and Concord Wild and Scenic River Stewardship Council