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May 26, 2023

Secretary Rebecca L. Tepper
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Copy to: Michael.Paiewonsky@stantec.com
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RE: Memorial Drive Phase III

Dear Secretary Tepper,

We welcome the chance to respond to the most recent iteration of the proposal of the Department of Conservation and Recreation (“DCR”) to reconstruct Memorial Drive and the neighboring parkland. Please note that we have submitted previous comments about this project on January 27, 2022, July 21, 2022., and January 6, 2023. We also provided a letter to Dan Driscoll at DCR on April 29, 2022, following a site visit that he led on April 8, 2022.

Our comments have consistently raised the following chief concerns about DCR’s proposal: (1) DCR has proposed significant structural intrusions into the landscape, an area that has historically been pastoral and should remain so, including its proposals to install wider paved walkways between Memorial Drive and the Charles River, to add viewing stations along the river, and to add blinking traffic signals; (2) DCR has not adequately proposed how to preserve and maintain the allée of London Plane trees that define the historic landscape; and (3) in other ways, DCR has failed to treat the landscape first as a park, including for instance by failing to impose a safe speed limit along Memorial Drive.

We offer more detailed comments today.

Please note that when we use quotation marks, we are referring to text taken directly from the Charles River Basin Master Plan, *Charles River Basin. The Second Century, June 2000 (didactic poster)*, and when we use underlining of the quoted text, the emphasis is ours.

The current design for Phase III does not respect many of the major design principles elucidated in the Charles River Basin Master Plan that we have been advocating for during the more than two decades that have elapsed since the members of the Citizens Advisory Committee “donated

thousands of hours of time to inform the planning process.” Two of our trustees were part of that process.

A. The Riverbank Should Be For Pedestrians Only

From our many decades of experience with this parkland, we are convinced that the redesign must return the riverbank (the current area from Memorial Drive to the water) to pedestrian use only by creating an official bike/recreational vehicle lane on the space occupied by Memorial Drive, done in such a way as to offer full physical protection/separation from the higher speed car traffic.

As stated in the Master Plan:

“Provide safe and continuous bicycle, skating, and pedestrian access along the entire length of the Basin. Separate foot and bike paths where doing so will not create excessive pavement near the shoreline .

Provide a comfortable, safe, and secure experience for visitors by reducing congestion and minimizing conflicts on the paths....”

For more than two decades, we have been asking for this return of the riverbank to pedestrian use, which the proposed road diet makes possible. This would dramatically reduce the necessity of “excessive pavement near the shoreline” as in the present plan. It would enhance, significantly, the enjoyment of the parkland for those on foot, including the young and the elderly, thus fulfilling the desire to:

“Improve public access to the banks and water for people of all ages, abilities, and backgrounds.”

“Bicycles were allowed on the Esplanade for the first time in 1960 at the urging of Dr.Paul Dudley White....A continuous bicycle path was finally established around the entire Basin a decade later and named in honor of Doctor White.” The bike path was created simply by usurping the former pedestrian-only hard surface sidewalk. At present, with a narrow sidewalk, the bikes are forced to travel at a moderate speed. With the proposed significantly widened bike sidewalk, the bikes and other recreational vehicles will be able to travel at greater speeds, exacerbating the dangers for those on foot, on crutches, or in wheelchairs who need to share the hard surface.

The current proposal would eliminate the upper half of the grassy riverbank in the area up- and down- river from Sparks Street that now serves as a popular destination for picnicking, sunbathing, resting, reading, walking the dog, etc. The resulting redesign will make the remaining lawn steeper, thus practically useless as an area for isolated relaxation on the ground close to the water’s edge. This is the only area in the entire length of Riverbend Park that has such a picturesque character: its gently curving slope looks over the water toward the tree lined banks of the opposite shore. In this spot, and in this spot only, one enjoys the delightful illusion of being far away from city life.

B. A New Speed Limit of 25 m.p.h. Must Be Established

“Reduce the impact of cars on pedestrian paths and parklands while reinforcing the identity of the parkways as landscaped pleasure drives.”

Cars traveling at more than 25 mph are surely not on the roadway for “pleasure drives.”

Without a required speed reduction, one is bound to have impatient speedsters attempt to pass slower vehicles, thus exacerbating the already unpleasant situation for pedestrians due to the proposed doubled quantity of vehicles immediately adjacent to the inland sidewalk area. Therefore, one needs to **establish a new speed limit of 25 mph as an integral part of the redesigned roadway so that the public will accept the change as part of the major work being done.** It makes no sense to wait to see what happens, as is currently proposed.

C. **Fill In The Missing London Plane Trees in the Allée All The Way to the Boathouse**

“Strengthen the parkways and boulevard trees as the connecting threads of the Basin.”

The June 2000 poster includes a contemporaneous map of the riverscape in which the allée of trees extends along Memorial Drive from below the BU Bridge all the way to Watertown, echoing and respecting the Olmsted, Olmsted and Eliot plan of 1894. The reason currently given for not respecting this historic plan has to do with the trees’ susceptibility to diseases. Does this make sense if some of the original trees are still thriving after more than a century and a quarter? Following its design principle, after the Master Plan was finished, the MDC planted many trees to continue the allée in the area near the playlot. The historic design was respected then. It should be respected now. The allée should be filled in for the entire length of Riverbend Park where this would not interfere with existing trees.

D. **Eliminate Unnecessary Infrastructure**

“Subordinate man made structures to the landscape and design them to complement the pastoral river setting.”

For recreational purposes, for defining the character of the abutting communities, and for offering the public some semblance of the extraordinary beauty to be found in natural surroundings, the Charles River is the most precious asset we have. We need to show respect for it by eliminating as much infrastructure as possible.

Guard rails:

All existing barriers on the river side of Memorial Drive should be eliminated. The current plan calls for guardrails to be removed only where possible.

The proposed 30-foot overlooks:

Simply stated, we cannot see how 30-foot long wooden structures on posts “complement the pastoral river setting.” We have objected to these from the beginning, and continue to see no place for them in this setting.

In addition to being out of character, the restricted spaces under the platforms would certainly become prime collecting areas for blowing trash that would be difficult to remove.

E. **Perhaps Change the Route of the New Path to the Playlot**

The path, as shown, cuts across multiple major stabilizing roots of the large maple tree, some as large as 8 inches. Since we have lost three major trees in the last few years, it would be wise to have an arborist inspect the situation before excavation work is done. A route following the existing path might be less intrusive.

F. **Lack of provision for anticipated future increases in ground and flood waters**

The proposed regrading of the slope towards the water eliminates a large area which could have supported an expected storm water increase and sea level rise without creating flooding. The three small swales that DCR proposes are inadequate as they do not even replace what is lost by the proposed regrading and do not begin to plan for the future.

We are disappointed that the DCR's revisions have failed to address concerns we have been raising consistently.

Thank you for reading this text about the future of our beloved parkland. We hope the designers will be instructed to respond to our concerns positively.

Respectfully submitted,

The Trustees: Anne Duggan, Franziska Amacher, Jan Devereux, Patricia Sekler