

PEOPLE FOR RIVERBEND PARK TRUST
21 Gibson Street
Cambridge, MA 02138

January 27, 2022

Secretary Kathleen Theoharides
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: **Memorial Drive Phase III – Environmental Notification Form**

Dear Secretary Theoharides:

Thank you for the opportunity to comment on the proposal of the Department of Conservation and Recreation (“DCR”) to reconstruct Memorial Drive and the neighboring parkland. The Trustees of the People for Riverbend Park Trust (the “Trust”) support the comments provided by the Memorial Drive Alliance. In particular, for the safety and pleasure of park visitors, we share the long sought for goal of completely separating bicycles from pedestrians, although our suggestions for achieving this differ in detail. We write separately because of the Trust’s special relationship to this parkland.

Background

For background, the founder of our trust, Isabella Halsted, had the idea for eliminating vehicle traffic on Sundays along a stretch of Memorial Drive so that people could enjoy peaceful recreation by the Charles River. Ms. Halsted created the Trust in 1975, and due to her advocacy, her vision for Riverbend Park became memorialized into law in 1985 (Chapter 457 of the Acts of 1985). That law directs DCR to close Memorial Drive to vehicle traffic between Western Avenue and the Eliot Bridge every Sunday between April and November without exception, from 11 a.m. until 7 p.m. Last year, DCR decided to close Memorial Drive to vehicle traffic on Saturdays as well, and extended the annual park through the month of December.

In addition to advocating for the use and maintenance of the park, the Trust, working with volunteers including students from the Shady Hill School, maintains the gardens in Riverbend Park, from Hawthorn Street down to the Mount Auburn Hospital, with special attention paid to a garden and playlot for children (the Sekler Playlot, named for one of our Trustees, who transformed the playlot from an uninviting, uncared-for playground to a delightful and beautiful place for children and adults). Among other gardening activities, the Trust plants hundreds of bulbs every fall, including daffodil bulbs along the Charles River.

Comments

While the Trust was heartened to learn that DCR plans to move forward to improve the conditions of Riverbend Park and intends to rebalance the use of space to make the parkway less auto-dominated and more welcoming for recreational users, we have grave concerns about many aspects of the proposal including that: (a) DCR failed to provide any information in its ENF about the Sunday (and Saturday) closures of Memorial Drive to vehicle traffic, and how the weekend use of the park might be affected by these plans; (b) DCR's proposal contemplates a multitude of structural intrusions into the parkland, which the Trust believes are contrary to the vision for the park (including contrary to DCR's own Master Plan for the park), and which are specifically detrimental to the pastoral nature of the shoreline; and (c) DCR fails to adequately honor the historic allée of London Plane trees. We provide more detail about each of these concerns below.

- (a) The ENF failed to acknowledge Riverbend Park's existence, which naturally leaves us wondering if there was any consideration of how the roadway's proposed reduction from four to two lanes might impact the weekend park use, and whether there might be another alternative to implementing the road diet.**

When Memorial Drive is closed to vehicle traffic, it is well-used by cyclists, roller-bladers and skateboarders, groups of pedestrians, families with strollers, and others, especially when the weather is nice. Members of the public of all ages and abilities, from Cambridge and beyond, clearly enjoy using the park and having room to spread out. Even in the shoulder seasons of early spring and late fall, people continue to visit Riverbend because the experience of having such a wide paved area dedicated to recreation is uniquely appealing.

Simply stated, over the past four decades the weekend closings of Memorial Drive to vehicle traffic have become a beloved tradition that evoke the history of the area as parkland prior to the 1949 extension of Memorial Drive between Hawthorn Street and Gerry's Landing Road.

We are concerned that by failing to take Riverbend Park into account, DCR also failed to consider design alternatives that would continue to allow space for activities that need more room to spread out like roller-blading, skateboarding and teaching young children to bike. With the roadway's width reduced by half, park users would have significantly less space, and there would be more potential for conflicts among users traveling at different speeds. As an alternative, for example, DCR could maintain at least three lanes on Memorial Drive, with one protected and dedicated to two-way bike travel. Such would be preferable, we believe. Faster-moving cyclists and people using motorized wheelchairs could use the protected lane, leaving a single off-road pathway primarily for pedestrians and joggers to share.

This sort of alternative proposal could accomplish the goal of a road diet while also maintaining more space for trees and unpaved surfaces along the river. We believe this sort of alternative would enhance the experience of the parkland, would better preserve the

natural habitat along the shoreline, and would provide safer and more enjoyable facilities for cyclists and pedestrians.

- (b) DCR is now proposing a multitude of structural intrusions into the parkland, an area that has historically been pastoral and that should remain so. Without adequate renderings of the proposal, it is difficult to envision all that DCR is planning but it appears that many aspects of the proposal will be intrusive, unattractive, and inconsistent with its own Master Plan for the area.**

DCR has said that Riverbend Park, this stretch of the Charles River between the Eliot Bridge and the Anderson Bridge, has historically been a beautiful, pastoral setting, and should remain so. (See Charles River Basin Master Plan, 2002, available at [https://www.mass.gov/guides/dcr-master-plans#-charles-river-basin-master-plan-\(2002\)-](https://www.mass.gov/guides/dcr-master-plans#-charles-river-basin-master-plan-(2002)-).)

Accordingly, DCR specified in that Master Plan that there should be as few physical intrusions into this part of the parkland as possible. That Master Plan provided a comprehensive history of the park, noting that it was designed by Charles Eliot, an apprentice of Frederick Law Olmsted, who wished specifically to preserve the natural aspects of this section of the river.

Rather than follow its own guidance to limit structural intrusions into this stretch of parkland, DCR proposes intrusion after intrusion into the landscape, and its proposal would truly diminish the parkland and would make the riverfront less resilient to the projected climate change impacts of flooding and heat.

For instance, DCR proposes a new, wider (10') shared pedestrian and bike path (paved), plus a new 5' multi-use aggregate path. These are intended to replace the existing 6.5' path. There are significant safety concerns with this proposal (pedestrians and cyclists both prefer to use paths that separate them and reduce the potential for conflicts; the elderly and parents with small children hesitate to use a shared path along the river that does not provide adequate separation and safety for them, among other safety concerns) – but also, these two new paths represent a significant intrusion into the grassy expanse between Memorial Drive and the Charles River. Adding so much additional footage to off-road paths is not the remedy. Creating a protected two-way bike lane on the roadway would be preferable.

Further, in several areas where the 10' wide path adjoins the 5' wide path, this infrastructure requires an extreme change of the existing topography, including the removal of trees and plantings, and the addition of 400' of retaining walls.

Other intrusions include two new “overlooks,” a new “scenic vista area,” and two new blinking traffic signals. We are deeply troubled that these new structures are not adequately depicted in DCR’s proposal – and we are concerned that these new unnecessary structures be in the plans at all. We note that the overlooks would detract from the natural landscape and would shorten the view of the width of the river. As for the flashing beacon traffic signals at the two proposed new pedestrian crossings: while we applaud efforts to make the area safer and more pleasant for recreational users, we do not think flashing beacon signals

are either the safest or the most appropriate treatment for a crosswalk in this historical parkway setting and ask that DCR explore other alternatives.

In sum, DCR's proposal calls for an entirely renovated pathway system alongside the river (replacing a 6.5'-wide path with two new paths, one 10' wide and another 5' wide); two brand new retaining walls, totaling 400'; a new scenic vista area (with no renderings of what this will look like); two new overlooks, with only a "suggested" photo of another overlook at another location); and two new traffic signals. We note that all these overly intrusive elements will add significantly to the project's cost.

All of these proposals are for an area that right now is so natural, pastoral, and peaceful. Unlike wider sections of the riverbank where more active uses are appropriately encouraged, the area between Hawthorn Street and Gerry's Landing Road is a stretch where people come for quiet enjoyment. Introducing structured overlooks is inconsistent with the character of the area. While we agree that the area needs attention (the plant life, including all of the trees, all throughout the park desperately need attention), this proposal seems to us to go way too far.

- (c) The Trust has a particular interest in protecting what is left of the handsome allée of London Plane trees that define the historic landscape envisioned 125 years ago by Charles Eliot and Frederick Law Olmsted. DCR's proposal should prioritize preserving and restoring the historic allée of London Plane trees. It is the park's signature feature.**

The first London Plane tree was planted in 1897, and the famous allée of plane trees, conceived of by Charles Eliot and the Olmsted firm, have been celebrated since. The Trust organized and held a festival in 1998 to mark the 100th anniversary of the planting of the trees.

As part of the national celebration of the Bicentennial of Olmsted's birth in 2022 ([Olmsted 2000](#)), the Commonwealth allocated \$25,000 in American Rescue Plan Act (ARPA) funds to the Trust to install a historic marker at the site where the first of the trees was planted on April 22, 1897. The marker would be placed downriver from an existing young tree that sits on the spot where the first tree was planted on the river side of Memorial Drive, approximately opposite the fountain in John F. Kennedy Park. The marker will give the thousands who pass by daily some inkling of the origin of this majestic allée and hence increase their interest in and respect for this precious riverine parkland and hopefully awaken a concern for its future well-being.

In its 2002 Master Plan, DCR specifically took note of the iconic allée of London Plane trees, conducted a study of the health of the trees, and made recommendations concerning these trees. (See pages 182-84 of its Master Plan.) DCR specifically provided that the allée be preserved and in three pages of notes made meticulous suggestions for replacing dead trees, replanting London Plane trees where necessary, and undertaking efforts to maintain and protect the trees going forward. It is unclear to us why DCR appears to now be abandoning this plan.

DCR's plan now calls for the removal of seven London Plane trees from the allée, but it specifically does not address re-planting London Plane trees that will be removed now or that have been lost in the past in the allée. The proposal says that several new species of trees are planned to be planted, and according to an oral statement made by the landscaper, three new London Plane trees will be planted near the Anderson Bridge (but not in the allée).

Photos from the recent past show that the London Plane trees (often called Sycamores) were majestic, and they created a cathedral-like canopy across Memorial Drive. The grassy lawns stretched down to the river, and these old photos are a reminder that upkeep and maintenance are critical and have been lacking at Riverbend Park.

The replacement of uncared-for allée trees with another species makes little sense. London Plane trees are in fact ideally suited to withstand the impact of future flooding, heat waves, and other climate changes. Replacing the trees with other species destroys the continuity of the allée and of the "Cathedral" formed by the London Plane trees, both visually and functionally.

Conclusion

We note for the record that we have additional questions and concerns about certain other aspects of the plan, but reserve those for another day. We understand that DCR plans to hold a public hearing concerning this plan in early March of 2022, and that the public will have an opportunity to provide more suggestions then. We do wonder why, when public listening sessions were last held in mid-2019, which we attended, our group and other engaged advocates only learned the specifics of this ENF indirectly and with so little notice?

We hope – indeed, expect – that by the time of future public meetings, DCR will provide detailed scale renderings that show how the pathways (especially those on the river side) will look from the user's perspective at various points along the route. The technical drawings prepared for the ENF are not only hard to decipher section by section, but they obscure the specific landscape context, the human scale and the grading of the terrain. How will the proposed pathways relate to the existing trees and shoreline? There were no renderings of what the proposed overlooks would look like or how they and the scenic vista would be used. The placement of benches in relation to the pathways and the trees should be shown in the renderings as well. The renderings should show where the new trees will be planted and how they would look (their projected size and canopy) over their life cycle. The public cannot reasonably be asked to support a reconstruction project of this scale in such a sensitive area with the incomplete information provided in the ENF.

Since what will be done will affect very directly for many years to come the pleasure of those attracted to Riverbend Park, it is essential that wise decisions be taken. An enormous amount of analysis of the area involved has already been done at this 25% juncture in the design process. We look forward to greater collaboration with the DCR for the future of this wonderful riverine amenity that has served so well the citizens of the Commonwealth and its guests. We appreciate the opportunity to provide comments and look forward to engaging further to ensure that these sorely

needed improvements are planned and executed in ways that enhance and protect the river landscape and promote safe recreational uses of our precious parkland.

People for Riverbend Park Trust,
By its Trustees,

Franziska Amacher Anne Duggan Jan Devereux Terrence Doyle Patricia Sekler
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