

PEOPLE FOR RIVERBEND PARK TRUST

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April 29, 2022

Dan Driscoll  
Department of Conservation and Recreation  
251 Causeway Street, Suite 900  
Boston, MA 02114  
(delivered by email to [dan.driscoll@mass.gov](mailto:dan.driscoll@mass.gov))

RE: Reconstruction Project of Memorial Drive / Riverbend Park  
(DCR, Phase III)

Dear Dan:

Thank you for hosting the site visit on April 8, 2022, which we understand was scheduled to address the concerns of stakeholders that were raised during the MEPA meeting and comment period, including the concerns of People for Riverbend Park Trust.

While we continue to be thankful that DCR is addressing the conditions of the park since upgrades are badly needed, we remain skeptical of the plan as it stands, and do not believe that DCR will gain the community's consensus unless it revises its proposal in significant ways. The attendees of the April 8 site visit represented a broad constituency with considerable expertise in transportation planning, tree care, and landscape design, and the group left feeling discouraged and unheard.

Specifically, many of us remain concerned that (1) the proposal does not plan for adequately separated bike and pedestrian paths, which all stakeholders seem to prefer; (2) the plan to add significant pavement between Memorial Drive and the Charles River is inconsistent with DCR's own master plan for the area, and would serve to make the setting far less pastoral than it is; (3) further, in order to support all the new pavement proposed, DCR's design calls for the addition of 400 feet of retaining wall that would certainly make the riverbank look less natural – a design element that no one is excited about and that is avoidable; and (4) DCR is planning to add two viewing decks to the area where the retaining walls would be added – which again, is not a feature that the community requested or supports.

Although we were heartened to hear that DCR seemed persuaded that the allée of plane trees is worth preserving, at least in the area between Hawthorn and JFK Streets, we remain concerned that (1) DCR is proposing to remove some trees that are healthy (replacing a large, healthy tree with a small sapling is not a fair trade), and (2) DCR does not believe that the allée of trees is worth protecting for the entire length of the project.

To be more specific about our concerns:

### Separated Bike Path on Memorial Drive

As you know, several of those at the April 8<sup>th</sup> meeting asked you and others present: Why can't a separated bike path be created directly on Memorial Drive? By doing this, bikes and pedestrians would enjoy safer, separated facilities and there would be less potential for conflicts. With a road diet, there is adequate space to accommodate a separated bike lane within the existing right of way. To our disappointment, we could not seem to get a consistent answer to the question of whether the proposed five-foot buffer between the bike lane and the curb is a rigid requirement or the preferred choice among the several design options you considered. Among the answers given was that the design standards of the Department of Transportation require a five-foot separation from traffic on one side and a five-foot separation from the trees on the other side. But when we researched this answer, we did not find support for it. (<https://www.mass.gov/lists/separated-bike-lane-planning-design-guide>.)

Further, we wonder whether, even if there is something in the DOT (or another) guideline that supports DCR's position about not having a separated bike lane on Memorial Drive, the guideline could be relaxed for the short distance contemplated by this project, in this historic area for all the reasons cited by so many of the commenters to DCR's proposal.

### DCR's Proposal Would Pave Over Landscape, Require Retaining Walls and Add Unwanted Viewing Decks

If DCR were to create a bike path on Memorial Drive instead of adding additional paved pathway alongside the river, there would not be a need to fill and level the land near the river and there would not be a corresponding need for 400-feet of retaining wall. The proposed industrialization of the landscape – paving over the area near the river, creating a canal-like retaining wall, adding newly constructed viewing decks – is so inconsistent with the current mood of the river and would add significantly to the project's budget and the extent of construction. Everyone, including DCR in the recent past, who has looked at the design of this area has said that it should continue to be pastoral. Why is DCR giving up on this? The existing pedestrian path should be resurfaced and shored up in a few places to retain as much as possible the pastoral qualities that define the area's historic cultural landscape.

The addition of retaining walls and more paved surfaces along the riverfront would create a road-like pathway system that dominates and erases many of the remaining pastoral elements along the shoreline to the same extent that the roadway has been allowed to become the dominant feature of the parkland since its creation. The proposed road diet will not serve to restore the park's essential qualities if the riverfront is re-engineered like a highway. This is especially true in the area between Hawthorn Street and Gerry's Landing Road, the final segment of Memorial Drive's extension through the former Longfellow Park (in 1950), where the bulk of the proposed 400-foot retaining wall would be placed.

Further, when the travel lanes are closed to vehicles on weekends, retaining more of the former roadway would provide a paved space for bikes, skaters and others that is separate from the strolling path along the shoreline.

Without doubt, the area would benefit from some of the proposed landscape improvements – the trees have been uncared for, the vegetation is overgrown, the path is deteriorating in parts, but this does not mean that we believe that the shoreline area should be radically reconfigured with the sorts of industrial intrusions that DCR is now proposing. We would much prefer, for instance, that DCR forego the construction of viewing decks and instead direct whatever the costs associated with those structures are into a fund for the care and maintenance of the landscape.

### Plane Trees and Care of Parkland

Many of those who commented in the MEPA process raised concerns about DCR's disregard in its proposal for the historic allée of plane trees. At the site visit, you mentioned being persuaded by a comment that suggested that the most historic section of the allée is between Hawthorn and JFK Streets, and you announced that DCR is now proposing a 1:1 mitigation in that stretch of Memorial Drive – that is, for each plane tree that will be removed because of ill health or because it is in the way of the project, DCR will plant a new plane tree (sapling) in the area between Hawthorn and JFK Streets. The saplings planted in conjunction with the restoration of the Harvard Bridge several years ago have failed to thrive and will need to be replaced. This does not give us confidence that future saplings will fare any better. We believe that the beautiful allée, which extends beyond that small section, should be preserved within the entire length of the project.

We remain deeply troubled by DCR's cavalier approach to the trees and to the parkland in general. We heard you loud and clear that DCR does not have the budget to maintain this or other parks, and you approached so casually the idea that trees that are in ill health for want of care should be replaced. But this approach is disheartening and wasteful. When DCR is putting together a proposal such as this, and when there is money in the budget for a project of this size, why isn't DCR building something into the project to cover the costs for the ongoing care and maintenance of the trees and plants, for a good period of time? Why do ordinary citizens have to be asking for the trees to get some deep-root fertilization and pruning as a part of this proposal, as if we were asking for something outlandish? Again, it would be preferable to us to see funds being allocated towards the care and maintenance of the existing trees, shrubs and parkland before putting money into things like viewing decks.

There are other details in the proposal that the Trust has questions about, but we agree with the community consensus that the full separation of the pathways and the preservation of the trees and the pastoral landscape are of the utmost importance to achieving the best possible outcome for the future of park.

We would appreciate the chance to meet and discuss these most critical matters in person, before DCR schedules its first hearing on this project. Please contact Jan Devereux at [jan.devereux@gmail.com](mailto:jan.devereux@gmail.com) or at (617) 460-2235 to schedule a meeting.

Sincerely,

*Franziska Amacher Anne Duggan Jan Devereux Terrence Doyle Patricia Sekler*  
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