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John Simkins  
Federal Highway Administration  
400 North 8th Street, Suite 750  
Richmond, VA 23219

June 18, 2024

Dear Mr. Simkins,

On behalf of the Charles River Conservancy (CRC), I am writing to provide public comments on the Section 106 process for the Allston Multimodal Project.

The CRC's mission is to ensure that the Charles River and its parks remain a well-maintained network of natural urban places that invite and engage all in their use and stewardship. Founded in 2000, we have worked diligently in partnership with the Massachusetts Department of Conservation and Recreation (DCR), Massachusetts Department of Transportation (MassDOT), and other stakeholders to promote the active use and vitality of the Charles River parks, increase recreational and educational opportunities, and implement interventions that support ecological health, biodiversity, and resiliency.

Our work within the urban Charles River Reservation spans parks in Boston, Cambridge, Allston/Brighton, and Watertown, directly benefiting the 300,000 residents who live within walking distance of the Charles and the over 1 million people who visit it annually. Our efforts prioritize river health and resilience, ensuring it remains a healthy and welcoming space for everyone in our community.

Section 106 of the National Historic Preservation Act mandates that federal agencies consider the effects of their undertakings on historic properties. This process is crucial for ensuring that significant cultural and natural resources, such as the Charles River and its parklands, are protected and enhanced for future generations.

We appreciate the opportunity to comment and would like to emphasize one overall takeaway:

## **Maintaining Status Quo is Not an Option**

The Allston Multimodal Project presents a unique opportunity to significantly enhance the Charles River and its surrounding parks along the historic shoreline. However, the current proposals—particularly along the “throat” section of the riverfront—largely settle for the status quo, which is frankly unacceptable. Excluding those riding in a car, the throat is so dangerous, noxious, and unpleasant for anyone navigating this corridor that people actively avoid (or if they must traverse, viscerally tolerate) this section of the riverfront. We urge the Federal Highway Administration and the Massachusetts Department of Transportation to prioritize improvements that are aspirational, exciting, inviting, and revolutionary for the city. Bottom line: We must do much better than “grin and bear it” where the parklands and public spaces are concerned.

The Project presents an opportunity to envision and create the type of parkland that Section 106 is intended to protect. Our vision is for a riverfront that is vibrant, accessible, and ecologically healthy, setting a precedent for urban parklands nationwide. We advocate strongly for a design that not only enhances the shoreline but also primarily preserves the parklands, improves the health and water quality of the river, and fortifies habitats for native plants and wildlife. Let's strive to design a riverfront that embodies our highest aspirations and stands as a cherished landmark for generations to come.

Below, we outline three critical factors that will guide the design we envision:

### **Creation of a Park and Riverfront for the People**

A central goal of the Project should be to create an accessible park and riverfront that's best-in-class in its functions as an active transportation corridor and stormwater management system. As this riverfront and parkway are legally designated as parkland, it is imperative to prioritize green infrastructure and well-maintained paths to ensure they truly feel and function as protected parklands. These improvements will foster a better-connected community and enhance the quality of life for residents and visitors alike.

We envision a design solution that is safe and inviting for pedestrians, cyclists, park goers, and simply anyone who wishes to navigate through. This parkland should not be something to barely tolerate while adjacent lanes of highway traffic emit noise and fumes, but rather a public space that fosters community connection and ecological well-being.

### **Decrease Impervious Surfaces**

We advocate for a reduction in impervious surfaces within the project area. Reducing the volume of asphalt and other impermeable materials adjacent to the river will significantly benefit the health and resilience of the river by mitigating stormwater runoff, decreasing the risk of flooding, and improving overall ecological health. Impervious surfaces prevent water from naturally infiltrating into the ground, leading to increased pollution and sedimentation in the river, which harms aquatic life and water quality.

While we recognize the complexity and sensitivity surrounding road design within the project, we support efforts to balance transportation needs with environmental and community benefits. Sustainable transportation alternatives, such as expanded public transit and improvements to the Paul Dudley White path, should be prioritized. Sustainable design alternatives, such as permeable pavements, rain gardens,

and bioswales, should be integral components of the project to enhance the river's resilience and ecological health.

### **Support for Innovative Ecological Solutions**

Innovative solutions like floating wetlands are an encouraging step towards addressing environmental concerns. We were pleased to see their inclusion in the shoreline design options that were presented for public review. However, it is essential to emphasize that floating wetlands should not divert attention from resolving critical issues like impervious surfaces or uninviting parklands. Let's aim to enhance the project design goals by incorporating more forward-thinking approaches that not only address current needs but also anticipate future challenges.

In conclusion, the Charles River Conservancy strongly believes that the Allston Multimodal Project has the potential to set a new standard for urban riverfront revitalization. In accordance with Section 106 of the National Historic Preservation Act, we urge that all decisions reflect a commitment to preserving and enhancing the historic and environmental integrity of the Charles River. We look forward to continued collaboration to achieve a vision of a vibrant, healthy, and accessible riverfront.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Jasinski". The signature is fluid and cursive, with the first name "Laura" being more prominent than the last name "Jasinski".

Laura Jasinski  
Executive Director, Charles River Conservancy  
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