

June 23, 2021

Via Form on website [DCR Public Comments | Mass.gov](#)

Department of Conservation and Recreation
Office of Public Outreach
251 Causeway Street
Boston, MA 02114

Re: Herter Park Master Plan

CRWA Comment #1

As you are aware, Charles River Watershed Association (“CRWA”) hosts numerous education and outreach events in Christian A. Herter Park, including the Run of the Charles. We are invested in park’s success and pleased to see the Department of Conservation and Recreation (“DCR”) progressing with a master planning process to restore and enhance this important public park right along the Charles River. CRWA submits the following comments to help inform development of the Herter Park Master Plan currently being prepared by DCR and Halvorson Design and associated subcontractors (collectively, the “Project Team”). Our comments are in response to the content presented at the June 10, 2021 Public Meeting. We have organized our comments to match the presentation topics.

CRWA Comment #2 - Circulation

CRWA supports increased and improved safe access to the park by pedestrians and bikers. We are pleased to see the Project Team incorporating consideration of connectivity with other nearby project s’ open space areas, as well as with schools and students. Our educational programming often includes students and better access to the park will facilitate that work.

CRWA Comment #3 - Parking

CRWA encourages the Project Team to incorporate green stormwater infrastructure (GSI) and other stormwater best management practices (BMPs) into the parking areas to reduce runoff quantities, reduce pollution from stormwater runoff (e.g., phosphorous, solids, bacteria, etc.), and enhance visibility of these practices to the public. In addition, we are pleased to see that the Project Team is considering which parking lots should remain and in what form—any opportunities to reduce overall impervious cover should be incorporated into the Master Plan. We recognize that some events (i.e., Head of the Charles) have significant parking needs; however, alternative parking options—such as overflow parking on Soldiers Field Road—could be arranged for those limited events. This would allow for greening of the parking lots and reduction of impervious cover, improving stormwater management and river health. Implementation of GSI in parking lots that provides year-round and long-term benefits should not be sacrificed in order to accommodate two or three large events a year that need extended parking, especially when such parking is available on existing roadways.

CRWA Comment #4- Vegetation

Existing mature trees should be preserved, except those with health issues or those that pose a public safety risk. We urge the Project Team to consult with an arborist to evaluate trees for suitability of presentation and that as many trees as possible be maintained (specifically those whose suitability is determined to be moderate or high). We request more information from the Project Team on the “goals” of the moat (e.g., is it supposed to flow? provide fish habitat? flood storage? accessible recreational area? etc.). The plan’s recommendations should be aligned with those goals.

CRWA supports removal of invasive plant species that threaten ecosystem health, and supports restoration efforts to bring back native vegetation. Overall, ecosystem health should be improved across the entire park. We ask the Project Team to consider designating specific areas for use like passive recreation vs active recreation and associated planting needs. There may be opportunities to reduce “lawn” areas and replace them with more diverse species. In addition, the Commonwealth recently completed a healthy soils plan. Herter Park would be a great place to put some of those recommendations into action. We ask the Project Team to explain consistency with this effort in its development of the Master Plan.

CRWA Comment #5

Program Activities

CRWA holds the following types of events at Herter Park on a periodic basis (Educational table with “watershed in a box” demonstration; walking tours of the park features; in collaboration with Paddle Boston, canoe and kayak tours of the River; and educational sessions for students in nearby schools. Since these events typically draw groups up to 40 people or less, or are for passers-by, the park’s current parking and circulation are more than adequate.

Our Run of the Charles event is a large event that draws hundreds of people and typically fills the parking lots, including for use as space for tents and booths. Improved pedestrian and bike access, as well as streamlined parking, would benefit this event and reduce overall parking needs. This event does not require changes to the circulation of the park. We anticipate that these needs are consistent with the needs of other stakeholders for their programming.

CRWA Comment #6- **Herter Amphitheater**

We are pleased to see consideration of a second egress and improved accessibility for the Herter Amphitheater. However, in doing this work, we urge the Project Team to preserve mature trees (in collaboration with an arborist as noted in our previous comment on vegetation) and remove invasive species.

CRWA Comment #7- **Herter Center**

We support preservation of the history of the park, including the Herter Center. The original building constructed in the 1950s, still on site, once had a spectacular views of the Charles River. The architecture emphasizes the connection between the built environment and nature and reminds users of the importance of the River and all of its functions. We hope that this sentiment will be carried forward in the next iteration of the Herter Center.

CRWA Comment #8- **Visitor Experience**

CRWA strongly supports improvements for universal accessibility. For any improvements that would extend impervious areas, we encourage the Project Team to utilize permeable solutions as feasible to comply with ADA requirements. We are pleased to see that the Project Team is considering adding amenities such as water fountains, bicycle racks, and trash receptacles. With proper maintenance, trash receptacles and even pet waste stations will help reduce the quantity of trash and pollution entering the Charles River. CRWA also supports the intent to maintain vistas at targeted locations and provide access to the River’s edge while balancing river health, ecosystem health, and nuisance species issues.

CRWA Comment #9 -**Signage and Wayfinding**

Generally, we are pleased to see the Project Team give attention to the need to simplify messaging and reduce the overall number of signs in the park, as well as add educational information as appropriate. We would hope this Master Planning effort results in improved signage about the Park. CRWA would like to see signage incorporate information about Christian A. Herter, the history of the site, Charles

River pollution cleanup progress, impacts from stormwater runoff, what green stormwater infrastructure can do, and what people can do at their own homes to reduce pollution in stormwater runoff. Additional information about invasive species, native plantings, and pollinators would be appropriate in various places in the park. Continuing to emphasize messages about not feeding wild animals (particularly geese), removing trash, and picking up after pets is also critical to river health.

CRWA Comment #10-Stormwater and Drainage

Given this site's proximity to the Charles River, improvements to stormwater management provide significant opportunities to mitigate detrimental environmental impacts from stormwater pollution and manage runoff quantities and rates under current and anticipated climate change scenarios.

CRWA Comment #10.1-Stormwater and Drainage

As you are aware, the Lower Basin of the Charles River is subject to a Total Maximum Daily Load (TMDL) for phosphorus (Total Maximum Daily Load for Nutrients In the Lower Charles River Basin, Massachusetts, June 2007 (EPA TMDL No. 33826)) and a TMDL for bacteria (Final Pathogen TMDL for the Charles River Watershed January 2007 (EPA TMDL No. 32371)). In addition, DCR is subject to the National Pollutant Discharge Elimination System General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4) in Massachusetts ("MS4GP") (effective July 1, 2018, subsequently modified on December 7, 2020), which includes provisions requiring DCR to develop and implement a Phosphorus Control Plan (PCP) that includes use of non-structural and structural controls to reduce the annual phosphorus load entering the river. Herter Park offers an incredible opportunity for DCR to address this MS4GP requirement for two key reasons (1) following the Master Planning effort, the park will undergo some construction which is the opportune and most cost-effective time to add structural stormwater controls, and (2) there is a great deal of available space in the park. We look forward to seeing more information in the Master Plan documenting how the drainage and stormwater improvements will address the pollutants of concern both in the TMDLs, as well as the most recently approved Final Integrated List of Waters.

CRWA Comment #10.2-Stormwater and Drainage

In addition, according to the National Climate Assessment, the amount of precipitation falling in very heavy events increased by 71% in New England from 1958 to 2012. The Climate Ready Boston Map Explorer shows that areas of Herter Park, as well as nearby areas that may drain to the moat in Herter Park or to the River through conveyances under the Herter Park land area, stormwater flooding in the near-, medium-, and long-term. The Boston Water and Sewer Commission ("BWSC") City of Boston Inundation Model shows extensive areas of flooding in and around Herter Park under various extreme weather events, some of which are predicted to be over one foot. CRWA requests that the Project Team provide additional detail in the Master Plan about the stormwater management systems' ability to manage—and, as feasible, reduce—current and predicted flooding from the drainage areas contributing the Charles River in this area, using the best available science.

CRWA Comment #10.3-Stormwater and Drainage

Finally, the Resilient MA Action Team (RMAT) "Climate Resilience Design Standards and Guidelines" have been released as a draft and include guidance for state-funded projects to enhance assessment of climate resilience as part of the state capital planning process to ensure consistency with the State Hazard Mitigation and Climate Adaptation Plan (SHMCAP). We request that the Project Team use the "beta" Climate Resilience Design Standards Tool to document the risks from climate change and guide design of mitigation strategies, as well as include the output as an appendix to the Master Plan.

CRWA Comment #11

Thank you for considering these comments. We look forward to seeing a full draft of the Herter Park Master Plan sometime in Fall 2021 and anticipate providing additional comments at that time during the stakeholder and public input process.

Janet Moonan, PE
Stormwater Program Director