



James Arthur Jemison, Director
Boston Planning & Development Agency
One City Hall, 9th Floor
Boston, MA 02201

January 31, 2024

Re: **Boston Unity Soccer Partners – White Stadium, Project Notification Form (PNF)**

Dear Director Jemison and Distinguished Board Members,

We write on behalf of Zoo New England which operates the Franklin Park Zoo (“FPZ”). Thank you for the opportunity to participate in the public review process and provide comments regarding the proposed redevelopment of White Stadium (the “Project”), proposed by Boston Unity Soccer Partners LLC (“BUSP”) and presently seeking BPDA Large Project Review approval under Article 80 of the Boston Zoning Code. We appreciate the Mayor’s bold vision to maximize the potential for White Stadium and the Boston Public Schools athletes.

The Project will renovate and expand the existing Stadium to include a professional soccer stadium and offices, Boston Public Schools athletic training areas, and a student resource center. The Project will also include accessory buildings for retail sales, as well as restaurants and alcohol facilities for year-round programming in a proposed area called the Grove.

These developments can deliver exciting benefits and unlock new opportunities for area residents, businesses and park users if appropriately designed and conditioned. But the Project also will impact Boston Public Schools student athletes, residents of the surrounding neighborhoods, area businesses, casual park users, pedestrians, the Franklin Park Zoo, the golf course, and local traffic. These important impacts require further information, study, and more detailed design before the BPDA can determine whether it will benefit all in the surrounding areas.

FPZ will continue to work with the City and BUSP to maximize its benefits to the community. Given the potential adverse consequences of the BPDA’s decision, however, we ask that any decision by the BPDA on the Project be delayed until: 1) **adequate information regarding the Project’s impacts** is provided; 2) the proposed **transportation plans are further developed**, including design solutions for traffic congestion and parking impacts created by the current transportation plan; 3) the BPDA and the public are provided with the **opportunity to review the Project in its totality** rather than just the impacts of half the total project; and 4) required **Article 97 and MEPA reviews have been conducted**.

Franklin Park Zoo

Founded in 1912, the Franklin Park Zoo is nestled on 72 acres in the Emerald Necklace’s Franklin Park (hereinafter “Park”). Our 112-year old institution is home to 1,130 animals and in FY23 was visited by more than 628,515 individuals, families and schoolchildren.

All Massachusetts schoolchildren enjoy free field trips with their schools throughout the school year. In FY23, FPZ welcomed approximately 50,000 schoolchildren who visited as part of school field trips. To ensure access to all, FPZ offers a number of access programs including our EBT “Card to Culture” program with 75,000 users last year alone. FPZ also operates an EBT membership program to provide low-cost opportunities for multiple visits. Additionally, FPZ, which is accredited by the Association of Zoos and Aquariums, is committed to its mission to protect and sustain the natural world for future generations. FPZ educates visitors about the importance of wildlife conservation and actively works to save some of the world’s critically endangered wildlife.

FPZ is a committed partner to the Commonwealth, City of Boston and the neighborhoods surrounding the zoo. In recent years, attendance has grown tremendously for both daytime visitation and our seasonal evening event, Boston Lights. We provide an array of educational programs, services and community outreach including school programs, afterschool programs, teacher workshops, adult programs, and summer camp to name a few. We have partnered with the City of Boston for 25 years on our summer ZooTeen work and life skills program, and partnered with Boston Afterschool and Beyond to provide enriching, powerful learning for Boston’s 5th Quarter Learning summer school initiative for rising fourth and fifth graders. FPZ is also a participating partner in the new Boston Public Schools Culture Pass program. Based on a three-year co-design initiative, FPZ is currently partnering with Countdown to Kindergarten on a free pre-school playgroup. In conjunction with Boston Outdoor Preschool Network, FPZ will open a five-day a week pre-school program in September.

Further Study of Traffic Impacts is Essential

After careful review of the Project Notification Form (PNF) and participation in many BUSP meetings, we believe the transportation impact analyses and demand management plans developed to date are insufficient to meet the traffic and parking challenges. We have heard that the *historical data* suggests there are no congestion/traffic issues in Franklin Park. Respectfully, this is simply not the case. There currently exists a lack of parking for Park users, FPZ visitors and golfers. FPZ is both a daytime and evening destination during the months of July, August, September and October. During the summer months, parking is limited and congestion overwhelming even without accounting for the many special events that occur in the Park, including cultural festivals and concerts. Further traffic studies are required to fully characterize the existing congestion and severe lack of parking in the area, especially during the months of BUSP’s planned operations when other events and programming are already most active throughout Franklin Park.

BUSP and the City are aware of the parking challenges that already exist in the Park. As such, the current Transportation Plan has been configured to *encourage* patrons to find alternative modes of transportation than driving personal vehicles. However, there is nothing to prevent soccer patrons from driving directly to the Stadium.

The plan rests on the assumption that only 45% of the 11,000 patrons will arrive by some vehicle (whether personal or ride-share/taxi services), that 15% will walk/bike and an additional 40% will take public transit (which still requires patrons to be shuttled to and from the Stadium). To deter an onslaught of personal vehicles in Franklin Park on game days, patrons will be informed that there is no parking on site when buying their tickets and encouraged to utilize other travel modes. These

alternatives include satellite parking lots serviced by an estimated 95 large buses and an undisclosed number of shuttle buses from two MBTA stations (Jackson Square and Forest Hills).

As updated from the PNF and presented in recent meetings, the Transportation Plan involves some spectator drop-off and loading in the vicinity of Walnut Avenue, but approximately 75% of the large buses will enter Franklin Park along Circuit Drive to bring spectators to and from the Stadium. It is estimated that each of these buses will enter and leave the Park a total of four times, for 300 one-way trips. An unspecified number of shuttle buses will also enter from Morton Street and follow the same route within the Park to transport spectators between the Stadium and Forest Hills Station. This traffic will occur primarily during a two-hour period prior to the game and immediately following the game.

We are very grateful that BUSP's *intention* is not to add to the existing parking challenges with the addition of 11,000 spectators to Franklin Park on the planned 20 game days. However, specifically missing from the BUSP study is any calculation of the effect of the approximate 95 buses and an unidentified number of shuttles from the Forest Hills and Jackson Square MBTA stations entering the park on game days on the existing parking deficits and the traffic congestion. The addition of upwards of 300+ large bus trips and a yet to be identified number of MBTA shuttles into the area will only exacerbate congestion and negatively impact existing parking challenges and commuter traffic through the Park and the surrounding neighborhoods.

The Transportation Plan also needs to study the need for additional pedestrian crossings in the Park. Currently, pedestrians regularly enjoy walking through the Park and can be seen crossing Circuit Drive to access trails and sidewalks. The game-day circulation of large buses, which are 2.5 times longer and nearly 20 times heavier than the average personal vehicle, raises concerns regarding the safety of Park users. With all the large bus and shuttle traffic in the Park on game days, crosswalks and other pedestrian protections will be needed.

We believe that it is possible to ease parking and congestion in the Park, but this requires a comprehensive parking and transportation solution involving the City, the Boston Parks Department, FPZ, the golf course and community representation. There is much at stake for all parties in this matter. As such, FPZ requests:

- An environmental impact study of the proposed game-day Transportation Plan on existing congestion and parking on Circuit Drive, and parking within Franklin Park.
- Study on pedestrian safety mitigation and the need for additional crosswalks as a result of the increased large bus and shuttle traffic introduced on game days.

BUSP Should be Required to Study Actual Saturday Traffic Conditions, Especially During Peak Times in the Summer

Traffic data collection serves as the foundation for the transportation analyses required under Article 80 Large Project Review. To date, BUSP has conducted only limited studies of the five intersections on the north side of White Stadium in the vicinity of Walnut Street. It is our understanding that the reported intersection analyses don't address the duration of data collection or consideration of seasonal impacts. Weekend traffic volumes, which will be highest within

Franklin Park, have not been adequately accounted for. Peak hour traffic volumes for a Saturday cannot be accurately extrapolated from Turning Movement Counts collected on a Tuesday in November for a 12-hour period (vs a 24-hour period) between 7 a.m. and 6 p.m., even if MassDOT Weekday Seasonal Factors or additional Automatic Traffic Recorder counts were applied.

To thoroughly assess and identify appropriate mitigation for the Project impacts to the surrounding transportation network, the traffic data collected and utilized must present current conditions and needs as accurately as possible. While traffic study assessments can “account” for seasonal variations in traffic volumes throughout the year with MassDOT Weekday Seasonal Factors, these values are gross averages of traffic across all roads of the same MassDOT classification. This type of correction factor would result in a wild oversimplification of seasonal differences at the wrong spatial scale. It is insufficient to assess, and ultimately decide against studying seasonal differences, based upon all U4/U5 roads across the entire state. The data collection standards required of developments in proximity to Fenway Park and North Station should be applied here, and therefore require data collection on large event and non-event days to fully capture and assess traffic conditions. We should ensure that the Project does not unduly burden the residents, Park users, and surrounding business without properly designing a plan that mitigates the impacts.

As such, we urge the BPDA to defer any decision until these additional studies are completed.

The BPDA Should Require Additional Studies of the Project Impact on the Roadways Surrounding and Leading into the Park Before Making any Assessment on the Article 80 Large Project Application

The foundation of the proposed Transportation Plan is the premise that the buses on game days will be spaced every 2 to 3 minutes and that their presence in the Park will not create congestion on Circuit Drive nor on surrounding community roadways. Respectfully, to claim there will be no congestion in the park while this steady stream of buses drops off and picks up patrons is difficult to support. Where will these buses idle while they wait for patrons to disembark and how will this affect through traffic in the park and zoo goers, casual park users, pedestrians and golfers trying to reach their destinations? Until such time as the studies have been completed and the BPDA members have had a chance to review, it is premature to advance the project.

FPZ requests the existing study area be expanded to include the following intersections that support critical MBTA services and provide primary vehicular access into and out of Franklin Park:

1. Blue Hill Avenue / Columbia Road / Franklin Park Road (signalized)
 - Identified as the most-used park entrance from Franklin Park Action Plan community surveys (Franklin Park Action Plan, page 132).
 - Proposed as one of two entrances for game-day shuttle operations.
2. Glen Lane / Blue Hill Avenue / Glenway Street (signalized)
 - Proposed exit for shuttle buses entering at Blue Hill Avenue.
3. Old Road / Columbia Road (unsignalized)
 - Intersection commonly used by vehicles exiting Franklin Park at Glen Lane.
4. Blue Hill Avenue / Seaver Street (signalized)

- Major intersection directing traffic around Franklin Park and connecting MBTA bus lines to rapid transit stations, specifically servicing Route 14, 22, 28, 29, 45 buses.
5. Blue Hill Avenue / American Legion Highway (signalized)
 - Services transit stops for Route 14, 22, 28, 29, 45 buses, specifically where Route 14 buses travel along the southeast edge of Franklin Park toward Morton Street.
 6. Circuit Drive at Shattuck Hospital (unsignalized)
 - Interior split of Circuit Drive around Shattuck Hospital providing access to the Franklin Park tennis courts and Scarborough Pond area.
 7. Circuit Drive / Morton Street / Arborway (signalized)
 - Major intersection directing traffic and MBTA bus services into and around Franklin Park, specifically servicing Route 16 buses along Circuit Drive and Route 21 and 31 buses along the Park's southern edge.
 - Proposed as a primary entrance/exit for game-day shuttle operations, including MBTA Orange Line shuttles from Forest Hills Station.

BPDA Should Review and Consider the Impacts of the Project as a Whole

While the City may not be required to file their portion of the project for Article 80 approval and public review, the Project and its impact cannot be properly evaluated without it being viewed in its totality. The total size and impact of the project, including renovation of both grandstands and creation and programming of the Grove area, should be part of the BPDA review.

Necessity of an Article 97 Review Should be Evaluated

Prior to any approval of the Project by the BPDA and certainly before any construction begins, an Article 97 review with the Massachusetts Office of Energy and the Environment for applicability should occur, because the Project will forever alter the nature and use of this park land into a site for professional sports and potentially new concerts, restaurant and alcohol establishment. If it is applicable, the review and accompanying public comment period should take place. If not, then the public should be informed as to why Article 97 does not apply.

MEPA Review May be Required

Also for consideration is the request that a Massachusetts Environmental Policy Act ("MEPA") review be conducted prior to a decision by the Board. Because White Stadium is located in an Environmental Justice Population area, it is our understanding that certain procedures including a MEPA Study are required. The sheer size of the Project, both the BUSP portion and the City of Boston portion with the questions of noise, light, flooding on Circuit Drive, transportation/traffic and visual impacts in and around the Park suggests that environmental impacts must be reviewed. Until such time as a MEPA review has been concluded, it is premature to consider approving this Project.

Conclusion

We are not suggesting the renovations to White Stadium shouldn't happen. We appreciate the work BUSP and the City have done to bring this opportunity to Boston. We are appreciative of the

efforts of BUSP and the City, their willingness to meet and discuss our concerns, and even make changes based upon community feedback. However, the Project could produce significant negative impacts on the area. These potential negative impacts have not been fully evaluated and require further study.

Until these concerns are fully evaluated, approval from the BPDA would be premature. We ask the BPDA to defer consideration of the project until further studies have been conducted.

Thank you for your consideration.

Sincerely,



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President & CEO



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Zoo New England's mission is to inspire people to protect and sustain the natural world for future generations by creating fun and engaging experiences that integrate wildlife and conservation programs, research, and education. AZA accredited.