



Emerald Necklace

CONSERVANCY

Connecting People and Parks and Conserving the Emerald Necklace

CHARLESGATE PARK • BACK BAY FENS • RIVERWAY • OLMSTED PARK • JAMAICA POND • ARNOLD ARBORETUM • FRANKLIN PARK

Karen Mauney-Brodek, *President*

BOARD OF DIRECTORS

Benjamin Taylor, *Chair*
Ted Landsmark, *Vice Chair*
Barbara Millen, *Vice Chair*
Martin Hall, *Treasurer*
Ellie Cornish Chu, *Clerk*
Louis Bailey
Pam Beale
Sonya Bhabhalia
Karenlyn Bunch
Constance Cervone
John R. Cook, Jr.
Christine Cusick
Sarah Freeman
Joan Helpern Goldberg
Julie Hume Gordon
Stephen Gray
Marjorie Greville
Lisa Hastings
Lois R. Kunian
Sofia Lingos-Papaliadis
Daniel Moon
Lee Moreau
JoAnn Robinson
Chair, Park Advisors
Leo Swift
Kate Velásquez-Heller

Life Trustees
Michael Dukakis
Wendy Shattuck

PARK ADVISORS

Arboretum Park Conservancy
Arborway Coalition
Arnold Arboretum
Authentic Caribbean Foundation
Boston Committee of the
Garden Club of America
Boston Society of
Landscape Architects
Brookline GreenSpace Alliance
Charlesgate Alliance
Emerald Necklace
Greenway Project
The Fenway Alliance
Fenway Civic Association
Fenway CDC
Fenway Garden Society
Franklin Park Coalition
Franklin Park Zoo /
Zoo New England
Friends of the Boston Park
Rangers Mounted Unit
Friends of Jamaica Pond
Friends of Leverett Pond
Friends of the Muddy River
Isabella Stewart Gardner Museum
Jamaica Hills Association
Jamaica Pond Association
Longwood Collective
Muddy Water Initiative
Museum of Fine Arts, Boston

January 18, 2024

Boston Planning & Development Agency Board of Directors
One City Hall, 9th Floor
Boston, MA 02201

Re: Proposed Text and Map Amendments Creating Open Space Stadium
Subdistrict in Franklin Park

Dear Members of the BPDA Board, Staff and Others Concerned:

We strongly urge you to defer consideration of any votes authorizing a petition to the Zoning Commission to amend Article 33 of the Zoning Code and related provisions creating a new “Stadium Open Space” subdistrict in Franklin Park to allow the alteration, expansion and use of White Stadium, open space/park land associated with it, and the historic Overlook Ruins and Elma Lewis Playhouse Site and the construction of related facilities without appropriate consideration and process.

The proposed amendments reflect an unusually rushed process without due consideration of both the effects of the zoning changes and the dramatic impacts that the proposed uses of White Stadium will impose on Franklin Park.

Franklin Park is on the National Register of Historic Places and an official City of Boston Landmarks, and is a critical park for our city and our environmental justice communities.

The outreach and process has been completely inadequate and this proposal is not one that protects the city, our parks or the communities it is intended to serve.

Section 2A of the BZC defines “open space” as:

Open space in public ownership dedicated to or appropriated for active or passive recreational use or to the conservation of natural resources; including but not limited to the waterway areas, beaches, reservations, parks, and playgrounds within the boundaries of the City of Boston; or open space in private ownership for active or passive recreational use or for the conservation of natural resources.

Accordingly, the nine (9) existing open space subdistricts recognized in Section 33 allow only a very few types of accessory structures, such as buildings or structures of not more than 600 square feet in an OS-P (Parkland) subdistrict (Section 33-9), and structures for shelter and refreshment of persons frequenting parks and other park purposes in parks under the control of Boston Parks and Recreation, the National Park Service or the MDC (Section 33-9).

Consistent with this very limited range of allowed structures, there are no dimensional regulations in the Greater Mattapan Neighborhood District (BZC Article 60) for structures in open space subdistricts within the Neighborhood District.

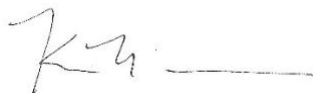
The proposed new Section 33-12, Stadium Open Space Subdistrict, and related text amendments purport to regulate open space. Instead, they would allow in a new “open space” subdistrict structures including stadiums, amphitheatres, retail facilities, restaurants serving alcohol and entertainment facilities, **all of any size and configuration, free of dimensional requirements.** As presented, the proposed amendments would appear to allow the replacement of White Stadium with a massive 100,000-seat stadium without constraint by zoning regulation. This cannot have been intended.

The project spurring this hasty re-zoning raises extensive, serious concerns for Franklin Park which require thoughtful consideration, including the dedication of public open space and recreational facilities to support various private uses, including professional sports operations; corporate sponsorship; retail sales; restaurants serving alcohol; and “entertainment” facilities.

As the urban planning agency of the City of Boston, the BDPA should recognize that re-zoning of open space within Franklin Park requires additional planning and consideration to avoid unintended and potentially disastrous consequences.

This proposal is not one that protects the city, our parks or the communities it is intended to serve.

Sincerely,

A handwritten signature in black ink, appearing to read 'KMauney-Brodek', followed by a horizontal line.

Karen Mauney-Brodek
President
Emerald Necklace Conservancy