



February 2, 2024

Boston Parks and Recreation Commission
1010 Massachusetts Ave., 3rd floor
Boston, MA 02118

Dear Commissioner Woods and Associate Commissioners Birdseye, Bollinger, Epperson, Queeley, and White-Hammond,

Thank you for the opportunity to address the Commission about the proposals for White Stadium in Franklin Park. Boston is home to an unrivaled legacy of landscape architecture and planning, led by the Frederick Law Olmsted, Sr.-designed Emerald Necklace, which I have long said could be a World Heritage Site as the progenitor of a new landscape typology: the urban greenway.

Concerning Franklin Park, the largest park in the Emerald Necklace system, according to the preeminent Olmsted Scholar, Dr. Charles E. Beveridge it is one of the four great Olmsted-designed “Country Parks” in America, (the other three are Central and Prospect Parks in New York City and Washington Park in Chicago). There are numerous design principles, observations, and recommendations in the award-winning “[Franklin Park Action Plan](#)” that should be foundational to the White Stadium proposals. The Action Plan, as Mayor Michelle Wu says in her introductory letter in the document (p. 7), “is the result of a community-based effort coordinated by the Boston Parks and Recreation Department in partnership with the Franklin Park Coalition and a design team led by Reed Hilderbrand in collaboration with Agency Landscape + Planning and MASS Design Group.”

Mayor Wu’s letter also includes some very important guidelines that are worth stating here:

- The park must first and foremost adhere to its founding ideals as realized by Frederick Law Olmsted, which were to connect people with the landscape and to foster experiences of natural phenomena, open space, and outdoor recreation in the belief that doing so elevates daily life, promotes public health, and strengthens civic dialogue.
- The Action Plan does not aim to alter the park's purpose, character, or design. Instead, it offers suggestions for the renewed care and ongoing development of this priceless resource using an analysis of the park's history, communities, and ecologies.

The Action Plan (pp.86-87) also includes important observations about Franklin Park concerning its rural character (which was coveted by Olmsted), as well as long views, and appropriateness of materials and built elements:

- Rural vistas within and beyond the park were essential to its purpose - “an illusion of unlimited space’ and ‘unbroken countryside”;
- A long view across the Playstead provided a broad prospect through the Country Park and beyond to the Blue Hills of Milton;
- views afforded to the site were uninterrupted by the city around it, demonstrating the relationship of the park to its larger landscape context and enhancing its experiential qualities.
- Olmsted took a strict attitude towards built elements in the park, establishing that materials and construction methods should not express wealth or elegance. All park architecture,

walls, bridges, furnishings, and steps deferred to the power of picturesque scenery, and felt as if they had emerged from the landscape itself. Puddingstone mined from a quarry near Schoolmaster Hill was used to construct almost every built feature in the design, deepening the connection between park and place.

Given the stature and significance of Franklin Park, and more broadly, the Emerald Necklace – listed in the National Register of Historic Places and designated locally – analysis of impacts of the stadium project should be informed by the [Secretary of the Interior’s Guidelines for the Treatment of Cultural Landscapes](#), the federal level guidelines that provide comprehensive analytic tools for assessing sites eligible or listed in the National Register, or designated National Historic Landmarks. Perhaps the most significant organizational characteristics of a historic designed landscape like Franklin Park is its inherent [visual and spatial arrangement](#), like the rooms of a house.

An understanding of visual and spatial relationships is foundational to evaluating all planning efforts, otherwise you are assessing proposed structures (e.g. new buildings) and other features (e.g. height of scoreboard) in a vacuum. It is a core and essential when applying the Secretary of the Interior’s Standards to any new work in a park to aim to **avoid**, **minimize**, and **mitigate** the negative impacts created by the new work. Unfortunately, the White Stadium proposals presented to the public have been, for the most part, inwardly focused on the changes to the stadium and its associated new amenities and underrepresents the broader adverse visual and spatial effects on the park.



Ellicott Dale from the Arch Looking, S.E. (1892) Note the rural character and the absence of built elements or structures to protect the park’s unique rural character.

For example, visual impacts to the park’s immediate surrounds and longer viewsheds are created by the scoreboard, whether in use or not, expanded rooflines to the stadium, light fixtures, new buildings in “The Grove,” etc. These elements are visible from multiple vantage points, including the

Overlook and through the puddingstone arches, and disrupt the historic character, design intent, and feeling of being in a “Country Park” – a cornerstone principle of providing nature in the city for those that don’t have the ability or resources to travel.

Integral to the visual analysis noted above, additional attention should be given to understanding the impact of night lighting into the greater park landscape, not to mention the visibility of the night sky. In the same way that the visual impact of new built features is studied, the extent of “light trespass” into the greater park landscape should be studied for its impact on the quality and character of that experience.

The White Stadium proposals for Franklin Park appear to be advancing very quickly, which is problematic given the lack of the most foundational analysis for assessing this designated landscape. We strongly urge the Boston Parks and Recreation Commission, and other agencies with jurisdiction over this project, to require the critical visual and spatial analysis that would help avoid, minimize, and mitigate adverse effects to the Nationally significant Olmsted-designed landscape at Franklin Park. We also call upon the Commission, et al., to insure that the authentic public engagement that was a hallmark of the “[Franklin Park Action Plan](#)” is followed in assessing the White Stadium proposals.

Feel free to contact me with any questions and thank you for this opportunity to comment.

Sincerely,

A handwritten signature in dark ink, consisting of a large, stylized 'C' followed by a smaller 'B' and a long horizontal line extending to the right.

Charles A. Birnbaum, FASLA, FAAR
President and CEO

cc:

The Honorable Maura Healey, Governor of The Commonwealth of Massachusetts

The Honorable Andrea Campbell, Attorney General of The Commonwealth of Massachusetts

The Honorable M. Patrick Moore, First Assistant Attorney General of The Commonwealth of Massachusetts

The Honorable Jon Green, Division Chief, Non-Profit Organizations and Charities Division, Office of the Attorney General of The Commonwealth of Massachusetts

The Honorable Rebecca Tepper, Secretary, Executive Office of Energy and Environmental Affairs

The Honorable Tori Kim, Assistant Secretary and MEPA Director, Executive Office of Energy and Environmental Affairs

The Honorable Betsy Harper, Chief of the Environmental Protection Division, Executive Office of Energy and Environmental Affairs

The Honorable Michelle Wu, Mayor of the City of Boston

The Honorable Liz Miranda, State Senator

The Honorable Christopher J. Worrell, State Representative

The Honorable Michael Firestone, Chief of Policy and Strategic Planning, City of Boston

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