FORT HILL

STRATEGIC PERSPECTIVE. EXCEPTIONAL RESULTS.

Date: June 24, 2025

To: Franklin Park Defenders & Emerald Necklace Conservancy

From: William F. Lyons Jr., PE, PTOE, PTP, AICP CTP, Env SP, Esq.

RE: White Stadium Renovation - Boston Unity Soccer Partners, LLC

Introduction

Fort Hill Companies LLC (Fort Hill) has completed a comprehensive review of all transportation related information pertaining to the White Stadium Renovation Project ("Project") as presented by Boston Unity Soccer Partners, LLC ("Proponent" or "Applicant") in conjunction with an application filed with the City of Boston Planning and Development Agency ("BPDA") pursuant to Article 80 of the City of Boston Zoning Code ("Zoning Code"). Fort Hill has reviewed the following specific documents:

- Project Notification Form (PNF) dated December 18, 2023;
- White Stadium Public Meeting Presentation dated January 11, 2024
- Response to Public Comments dated January 12, 2024;
- Presentation to the Impact Advisory Group dated January 17, 2024
- Public Comments (Updated) dated February 1, 2024;

- Request for Supplemental Information dated April 4, 2024;
- Memorandum from BPDA Transportation Planning and the Boston Transportation Department, dated February 5, 2024, SUBJECT: Boston Unity Soccer Partners - White Stadium PNF Transportation Comments
- Presentation to the Impact Advisory Group dated May 15, 2024
- Supplemental Information Document dated May 2024; and
- Presentation to the Impact Advisory Group dated June 5, 2024
- White Stadium Transportation Plan Update (For Public comment) dated April 2025

We offer the following comments for consideration as part of the review process.

Executive Summary

The materials submitted to the Boston Planning and Development Agency (BPDA) in support of this project can be characterized as riddled with troubling opacity, internal contradictions, and unsupported assumptions and conclusions. The project's analyses rely on flawed data comparing this project to Fenway Park instead of other facilities of comparable attendance, scale, and context. From a transportation perspective, the project proposed in the PNF is radically different from the Supplemental Information Document. As a result, the project should be completely rethought from a transportation perspective and reanalyzed to reflect all of the material changes made throughout the public process.

Importantly, a significant amount of information is either intentionally omitted or inadequately developed, preventing a comprehensive analysis of the project proposal. The locations of satellite parking facilities remain undetermined or undisclosed, preventing an understanding of what approvals are required. The routes of shuttle buses on DCR parkways do not appear to have been coordinated. The use of MBTA restricted bus lanes and terminal facilities for pick-up/drop-off arrangements do not appear to be coordinated and approved. The answers to these questions bear on the jurisdiction of the MEPA regulations and the path for approval of this project.

The underlying assumption of this transportation plan is that it has been analyzed for soccer events for the Proponent. In point of fact, the renovated stadium will be available for a wide range of civil and – presumably – cultural events, such as festivals, concerts, rallies, and other events which could generate radically different traffic impacts. Unfortunately, only

one potential use case has been analyzed. Many unforeseen consequences could flow from this plan moving forward without further analysis. In short, this is an incomplete proposal at best and a poorly constructed proposal at worst.

In April 2025, the City of Boston published a document titled "White Stadium Transportation Plan Update (For Public Comment)". This document purports to bring clarity to the transportation plan for the stadium renovation and for traffic management during women's professional soccer games. In this document, the City attempts to quantify the number of new vehicle trips the soccer games will generate. It states that 4400 spectators will arrive by shuttle from unidentified remote lots, 2200 spectators will arrive by shuttle bus from MBTA stations, 2200 will walk from an MBTA station, 1100 will walk/bike, and 1100 will take a rideshare. This mode share estimate is different from all previous estimates. At this point, it is hard to take any of these trip generation analyses at face value as the City has abandoned any pretense of using a scientific method to project the number of new trips the site will generate for the soccer matches.

In the April 2025 document, the City did not submit ANY traffic analyses to help the public understand the impact of the project on local streets. In fact, they have not submitted any traffic analyses since the original submission which had significantly different assumptions and estimated site generated trips. The lack of any analysis goes against the policies of the Boston Transportation Department, which requires a Traffic Impact and Access Study (TIAS) conforming with current industry standards to be completed in conjunction with a project of this size and scale.

A quick review of the trip generation estimates submitted with this document reveal the following troubling issues requiring further analysis.

- **Combined, the MBTA shuttles and the remote lot shuttles would result in more than one shuttle per minute arriving and departing the site. There is not enough curb space to permit this volume of shuttle buses to arrive on the site.**
- **The City projects just under 30 pedestrians per minute arriving at the game on average, with much higher volumes during the peak 15 minutes prior to games. A substantial number of these pedestrians will travel down the roadways between the stadium and the MBTA stations and cross Walnut Ave. This will gridlock Walnut Ave along the west side of Franklin Park.**
- **No pedestrian traffic management plan improvements have been proposed.**
- **The City estimates just under 10 rideshare trips per minute. There is not enough curb space to accommodate this**

volume in the revised site plan. This will cause more havoc on local streets as ride share vehicles drop off passengers in unintended locations, causing additional foot traffic in the neighborhoods around Franklin Park.

- **The City continues to rely on unidentified satellite parking lots. What about the impact of those parking lots on nearby residents?**

Comments on Project Notification Form (PNF)

- Section 5.1.1 states that the stadium accommodates "approximately 10,000 spectators." This information does not provide the required context necessary to consider the no-build and build conditions from a qualitative perspective. It would be more useful to include average attendance or occupancy for events at the venue so residents and interested parties can comparatively assess the anticipated impact of the project.
- The study area in Section 5.1.3 is inadequate to assess the impacts of the project. As other commentators have noted, there are several additional locations that should be studied[1]. The comments offered by the Franklin Park Zoo correctly identify several additional locations which should be studied. Their rationale is practical and well justified. The intersections that should be studied include:
    - Blue Hill Avenue at Columbia Avenue and Franklin Park Road (the reference to the Franklin Park Action Plan (FPAP) is notable for its relevance to new development in Franklin Park);
    - Blue Hill Avenue at Glen Lane and Glenway Street;
    - Blue Hill Avenue at Seaver Street;
    - Blue Hill Avenue at American Legion Highway;
    - Columbia Road at Old Road; and
    - Arborway and Morton Street at Circuit Drive.

  These intersections are very likely to be impacted by the significant amount of shuttle bus trips expected as part of the Proponent's plan. This is especially true given the concerns we have regarding the trip distribution proposed by the

[1] Zoo New England, comment letter dated January 31, 2024

Proponent (as described below), which could result in substantially more of the site generated trips being drawn from the south and west of Franklin Park.

- In Section 5.2.5, the Proponent applies seasonal adjustment factors based on Massachusetts Department of Transportation (MassDOT) count stations from 2019 to adjust current volumes to seasonal peak volumes around Franklin Park. As a threshold matter, the use of these data is completely inappropriate. While the statewide data may be generally applicable to roadways in the City, the traffic characteristics (overall volumes, turning volumes, pedestrian and bicycle activity) associated with roadways around a public park are dramatically different from season to season and would not be expected to follow general statewide trends. Moreover, these adjustments are based on traffic volumes obtained before the Covid pandemic. These adjustments should be viewed as highly unreliable due to the fact that traffic volumes and patterns have changed dramatically since the pandemic. If these types of adjustments are to be (inadvisably) used, it would be more reasonable to calculate seasonal adjustment factors from current raw data available from MassDOT and the City of Boston.

- Section 5.2.6 represents that bicycle volumes were collected on study area roadways and states that the volumes are presented in Figure 5.5. Figure 5.5 reflects very few bike trips, which is counterintuitive. Raw bicycle count data do not appear to be provided, but if the bicycle counts were conducted in November, like the vehicle volumes, this would provide an explanation of low bicycle counts. Bicycle counts should be obtained in summer months to present a better understanding of impacts to bicycle travel, especially since the renovated facility will likely be used for summer uses, such as concerts.

- Section 5.2.7 represents that pedestrian counts were performed at the same time as the vehicle counts. For the reasons explained in the previous comment, this is inappropriate. Pedestrian counts should be conducted in months when peak pedestrian activity occurs.

- Section 5.3.1 discusses nearby developments that are being permitted and should be considered as background growth. This section omits the proposed development within Franklin Park at the Lemuel Shattuck Hospital, which is being redeveloped into a substance abuse treatment campus. The proposed project includes:

    - Replacing the hospital building with a new complex on a 13-acre campus;
    - Adding more than 400 permanent housing units; and
    - 450 treatment beds.

- Section 5.3.2 includes a discussion regarding proposed roadway and infrastructure improvements. The section describes a proposed Blue Hill Avenue Transportation Action Plan with a note that decisions on the design are due by January 2024. This section should be updated to reflect the current status of the project.

- Section 5.4.1 provides a discussion of trip generation estimates, which is the first step in analyzing traffic impacts associated with a specific land use. Notably, despite the purpose of the section, no trip generation estimates are presented. Instead, the Proponent states "this Project does not represent an increase in traffic to the area, only an increase in the frequency of these events." No justification for this assertion is provided. In point of fact, there is no data presented to support this assertion whatsoever. Our comments on Section 5.1.1 emphasize that no baseline information has been provided to compare no-build conditions with build conditions from a trip generation point of view because no counts of existing events on the site are presented. It strains belief that a stadium that accommodates 10,000 spectators somehow accommodates 11,000 spectators on a regular basis. The Proponent's own presentations (see, inter alia, the Impact Advisory Group presentation dated May 15, 2024) reflect that one event with an attendance of 15,000 spectators has occurred and most other events have included attendance between 1,000 spectators and 2,200 spectators. The Proponent's rationale and justification in this section is fundamentally flawed. Despite the flawed justification, the proponent appears to go on to analyze new site generated trips of 11,000 spectators.

- Further in Section 5.4.1, the Proponent states "The traffic demand management that is discussed in depth below will limit the impact of these events, without them it would be expected that approximately 1,770 vehicles would be generated by these events, as is already happening at times for events within Franklin Park." The Proponent offers this conclusory assertion without presenting any relevant data.

- Section 5.4.2 presents a discussion of transit services the Proponent intends to rely on to bring their spectators to the stadium. At the conclusion of this section, the Proponent states "There is the potential for further shuttle buses between the Fields Corner station along the Red Line and potentially the Fairmont Line." Such noncommittal statements have no bearing on the permitting of this site. Either they are provided a service mitigating their impacts or they are not. If there is no commitment to provide a service, it has no bearing on the proposal.

- Section 5.4.3 describes the project's intended bicycle accommodations. The proposed Bluebike valet service would certainly provide a benefit to spectators arriving by bicycle. However, it portends a significant bicycle storage requirement on site, which has not been adequately analyzed or articulated. Moreover, this section does not analyze how many site generated trips would be converted into bicycle trips.

- Section 5.4.4 describes the use satellite parking facilities. The size and location of these satellite parking facilities are not provided. It is not possible to judge the adequacy of these lots to suit the purposes of the project. In addition, the lack of specifics prevents a complete analysis of the project's scope and permitting posture since the location of those sites could impact the applicability of other sources of legal jurisdiction subject to the Zoning Code and the Massachusetts Environmental Policy Act (MEPA). While subsequent presentations to the IAG (see the Impact Advisory Group presentation dated May 15, 2024) show general locations of the parking lots, sufficient detail is not provided to allow a comprehensive review. Further, as these lots are an essential element of the transportation plan, the Proponent should be required to demonstrate site control over the parcels to prove the parking will be available for the duration of the City's lease to the Proponent.

- Section 5.4.5 presents the proposed travel mode share analysis to be used in the traffic impact analysis. The Proponent proposes to rely on mode share estimates based on studies of Fenway Park. This reliance is wholly inappropriate, to wit, attendance at a Red Sox game typically involves a parking fee in the vicinity of the park of $50 or more and a public transit fee of a few dollars. The economics of these two experiences are completely different. In addition, the scale of these two events and the public familiarity of these two events is completely inconsistent. The estimated mode split of 40% is not credible without more supporting data.

  There are ample more relevant examples in terms of scale and economics in the Boston region, such as college athletic events, specifically soccer events. In my capacity as Director of Traffic and Parking for the City of Somerville, I was a primary participant in evaluating the likely traffic impacts associated with the use of the Tufts University athletic facilities for a women's professional soccer team. I am very knowledgeable of the scale of these events and certain that comparing these events to a Red Sox event is inapt.

- Section 5.4.6 presents the Proponent's estimate of vehicle occupancy rate. The Proponent has similarly relied on the Fenway Park study for this information. For the same reasons, the Proponent's reliance on these data is inappropriate absent further relevant supporting data. An occupancy rate of 2.8 passengers per vehicle should be justified using data from a venue of similar size and scope, such as a collegiate athletic facility. This estimate is particularly concerning as applied to ride share occupancy, which is rarely above 2.0 in our experience. Further, the proposed occupancy rate of 50 passengers per shuttle bus appears to be unjustified by any study and conclusory in nature. Justification for this assumption should be provided.

- Section 5.4.7 presents the Proponent's site trip generation estimates by mode. Table 5-2 presents the specific site generated trip estimates by mode. The Proponent has estimated 1,650 vehicle trips by walk/bicycle, 4,400 trips by transit, and 4,950

site trips by passenger vehicle for a total of 11,000 site generated trips for a stadium occupancy capacity of 11,000. There are multiple issues associated with these estimates making them inappropriate as presented. First, these estimates rely on Fenway Park data, which, as described above, is not appropriate absent further justification. Second, these estimates do not include employees, vendors, players, coaching staff, emergency responders, and city personnel supporting the event. Third, in this context, bicycle and pedestrian trips should be separately estimated. Significant numbers of pedestrians (see the Impact Advisory Group presentation dated May 15, 2024, slide 22) crossing roadways around the stadium will severely impact traffic flow and capacity and render the submitted traffic analyses irrelevant. This will be further discussed below.

- Section 5.4.8 describes site access and circulation. The Proponent represents that significant numbers of spectators will arrive by rideshare (also known as TNCs or Transportation Network Companies). The Proponent has not specifically estimated the percentage of TNC mode share but has instead lumped this number into the passenger care mode share. This is wholly inappropriate because it does not provide a means of estimating the number of arrivals and departures (and thus site generated trips at specific locations). It also does not provide essential information needed to calculate the amount of curb space needed to accommodate all these TNC vehicles.

- Figure 5.14 illustrates the proposed site access plan. This plan shows two TNC drop off and pickup areas: one on Playstead Road and one in the small parking lot at the intersection of Seaver Street at Humboldt Avenue. It is our understanding that the location on Playstead Road has been eliminated (see the Impact Advisory Group presentation dated May 15, 2024) due to community opposition to the use of Playstead Road for passenger vehicles. This leaves the small lot to handle all of the TNC volume. It strains credibility to believe that this small lot is sufficient to accommodate all TNC demand absent any further justification (see Figure 1.13a: Rideshare Operations Plans of the Supplemental Information Document). There is a reference to TNCs using the intersection of Walnut Avenue at Park Lane and Pierpoint Road to access the site, but it does not appear that a drop off location for this circulation is still viable given the elimination of passenger vehicle traffic on Playstead Road.

- Section 5.4.9 provides the Proponent's proposed passenger vehicle trip estimates and trip distribution. As described above, we do not believe the use of an occupancy rate of 2.8 is appropriate absent further justification and thus find the number of anticipated passenger vehicles unsupportable. The report states the trip distribution is "based on the population density of the Greater Boston Area, expected location of spectators arriving by vehicles, engineering judgment, and the use of specific local knowledge to determine the most likely routes to the Project site." The report further directs the reader to Figure 5.5 for a graphical representation of the trip distribution. The Proponent provides no calculations, data, modeling, or other

scientific means of assigning trip distribution and trip assignment. For a project of this type and scope, trip distribution typically requires the use of a gravity model and substantial calculations to support the assumptions made. No such effort has been presented in this report. For that reason, the trip distribution is not credible as presented. Notably, the trip distribution reflects only 10% of site generated trips arriving via the Arborway and Morton Street, which suggests that only 10% of spectators would come from the western suburbs. In contrast, roughly 70% of the trips would come from the south and neighborhoods immediately proximate to the stadium, and 20% would come from the north of the stadium. This distribution strains credibility absent some scientific approach to justify such a disparate distribution.

- Figure 5.2 shows expected curb usage, with an emphasis on parking control. The plan shows no parking along Walnut Avenue. However, the means of stopping pickup/drop-off activity for passenger vehicles along Walnut Avenue between Columbia Avenue and Glen Road appears to rely on parking enforcement of an unknown quantity and the efforts of non-uniformed traffic personnel (see slide 41 of the Impact Advisory Group presentation dated May 15, 2024). The Proponent has also suggested potential turn restrictions at Columbia Road and Walnut Avenue (see Figure 1.13e: North Loop within Franklin Park of the Supplemental Information Document). Having managed a city parking enforcement department, my observation is that none of these efforts will adequately prevent pickup/drop off activity on the city roads around the Stadium.

- Figure 5.12: Orange Line Shuttle, Jackson Square Station appears to show the proposed shuttle vehicles accessing the Massachusetts Bay Transportation Authority (MBTA) station's restricted bus lane used for boarding and alighting. The use of this restricted lane would require the approval of the MBTA. This would constitute an "agency action" for the purposes of review pursuant to MEPA[2]. Figure 5.13: Orange Line Shuttle, Forest Hills Station similarly shows shuttle buses accessing the restricted bus lane at the Forest Hills Station.

- Figure 5.16: Project-Generated Vehicle Trips, Weekday p.m. and Saturday p.m. Peak Hours projects no site generated trips using Walnut Avenue to access the site. This is both oversimplified and unrealistic. The nature of urban traffic flows is that many drivers use indirect routes through neighborhoods to get to their destinations when main arteries are congested. This would almost certainly be the case for this project.

- Figure 5.16: Project-Generated Vehicle Trips, Weekday p.m. and Saturday p.m. Peak Hours also projects 104 left turns from Walnut Avenue onto Pierpoint Road. This is a very substantial number of southbound left turns across an opposing volume

[2] See 301 CMR 11.00

of 321 northbound through vehicles. This will be discussed further below.

- In Appendix D, p. 208, Build (2030) Conditions, the Proponent states "The study area intersections and approaches continue to operate at similar levels of service (LOS D or better) during the Build (2030) Condition weekday p.m. and Saturday p.m. peak hours." This is entirely misleading. While technically true, in the weekday evening peak hour, the Columbus Avenue east bound through/right lane queue grows by more than 60 feet. And while the Proponent acknowledges that the Seaver Street westbound left turn movement deteriorates from a level-of-service (LOS) E to an LOS of F, this delay also comes with an increase of 119 feet for the 95% queue, nearly doubling the queue for this movement.

- In Appendix D, p. 208, Build (2030) Conditions, the Proponent is reporting a southbound queue on Walnut Avenue at Park Lane and Pierpoint Road of 50 feet. This results is very misleading. The proponent is projecting that all of the pedestrian trips from the Green Street MBTA station will cross over Walnut Avenue at this intersection. Without any pedestrians, the proponent is projecting 20 second gaps in northbound Walnut Avenue through traffic to accommodate 30 second gaps in southbound Walnut Avenue left turn traffic. When throngs of pedestrians are crossing at this intersection, these gaps will be consumed with pedestrians. The pedestrian volumes projected at this intersection are likely to be a substantial percentage of the total pedestrian volumes for the project – as many as 550 pedestrians (Supplemental Information Document, p.1-24). The result will be extremely long queue on southbound Walnut Avenue, as left turns will be comingled with through traffic, holding up all flows until a sufficient gap in vehicular and pedestrian traffic is available.

- While it is still not clear exactly how many shuttle buses will circulate along Walnut Avenue (possibly 30 buses, according to the Supplemental Information Document, p.1-24; however, the Parkside Presentation dated July 10, 2024 reflects 40 shuttle buses), the traffic characteristics of these buses have more in common with heavy vehicles than passenger cars. They have longer start up times from a stop, maneuver more slowly, and operate more slowly. Despite this, the Proponent reports in the Synchro model traffic analysis inputs that heavy vehicle percentages of 2% for the eastbound right from Columbus Street to Walnut Avenue and 3% for the southbound through/right/left lane on Walnut Avenue southbound at Park Lane and Pierpoint Road. In practice, these buses will turn much slower than their passenger car counterparts and substantially reduce throughput at these intersections, further degrading LOS, increasing delay, and increasing queues.

- In the Vehicle Operations Analysis Summary, Saturday p.m. Peak Hour, p. 226 of Appendix D, the proponent projects that the Columbus Avenue eastbound through/right will see an increase of 16 seconds of delay and an increase in 95% queue length of 83 feet (approximately four passenger cars). The Seaver Street westbound left is expected to see an increase in delay of more than 13 seconds with an increase in 95% queue of 127 feet (approximately six passenger cars). These are not trivial

increases in delay or queues for intersections already at capacity. These projections do not take into account the impacts of coach buses on the capacity of these intersections, as described above.

- In the Vehicle Operations Analysis Summary, Saturday p.m. Peak Hour, p. 226 of Appendix D, the proponent projects that the Walnut Avenue southbound left/through/right lane will see an increase of 14 seconds of delay and an increase in 95% queue length of 54 feet (approximately three passenger cars). These projections do not take into account the impacts of coach buses on the capacity of these intersections, as described above.

Comments on Supplemental Information Document

- Section 1.6.3 states "The White Stadium Redevelopment Project is not undertaken by a State Agency, does not require a permit from a State Agency, and does not involve Financial Assistance or a Land Transfer by a State Agency. Therefore, the Project is not subject to MEPA jurisdiction." As a threshold matter, the standard for MEPA jurisdiction is not a "permit from a State Agency." The applicable standard is "Projects for which Agency Action is required[3]." Approvals from state agencies could include the following agency actions that have yet to be properly identified or analyzed due to the incomplete nature of the studies provided:
    - Possible traffic signal timing changes due to significant increases in traffic volumes on Arborway or Morton Street, which are state highways (MassDOT and/or Department of Conservation and Recreation (DCR));
    - The permitted use of the restricted bus lanes at the Jackson Square and Forest Hills MBTA stations by a private entity (MBTA);
    - The use of state property for remote satellite parking for spectators. While the Proponent has been coy with regard to the locations of these parking facilities, contrary to the requirements of the Article 80 process where "site control" is typically required for essential components of a project, conclusions can be drawn regarding the likely sites where adequate parking is available. For instance, it is relatively obvious that one of the sites to be used as a satellite parking is a MassDOT park and ride facility in in Quincy. This would require MassDOT consent, constituting an agency action. The combined new site generated trip amount of 22,000 vehicle trips (11,000 in/11,000 out), a mandatory EIR may be required.

[3] 301 CMR 11.01

- The use of DCR parkways by commercial vehicles, in violation of 302 CMR 11.00, which prohibits the operation of livery vehicles, taxis, and "any vehicle legally registered under appropriate state or federal laws or regulations for commercial purposes." This would apply to the use of DCR parkways such as VFW Parkway or Arborway. While the Commissioner has the authority to waive these regulations[4], the act of waiving the regulation can itself be construed to be an "action" pursuant to the MEPA regulations.

The point is that the Proponent's application is deficient in information necessary to (1) fully understand the scope, nature, and regulatory approvals required for the project in accordance with Article 80; and (2) understand whether MEPA applies to the totality of the project, as segmentation is unlawful, and approval at this stage of the project while the full scope of MEPA applicability is undetermined would be inconsistent with the MEPA statute and implementing regulations. The proposal is simply not complete enough for consideration.

- In Section 1.13, the Proponent states:

> "In the PNF from December 2023, the project team conducted an evaluation of the transportation impacts of the proposed Project at White Stadium in Franklin Park. That transportation study adhered to the BTD Transportation Access Plan Guidelines, and BPDA Article 80 Large Project Review process. Although many transportation aspects of the Project have been detailed more thoroughly and improved through discussions with the City staff and the public, the transportation section of the PNF still provides an appropriate analysis of the transportation impacts of the Project. The following provides more detail in responding to comments received on the PNF."

I respectfully disagree with this assessment. The study area is deficient and leaves ample questions unresolved as to the methods and assumptions used, the data used, and compliance with Article 80 compliance with regard to site control. The baseline assumptions associated with the project have significantly evolved from the time the PNF was submitted, requiring – at a minimum – that many of the analyses be updated and/or revised. Moreover, as detailed in earlier comments, many of the assumptions as to mode split and trip distribution and fundamentally flawed as presented. A revised PNF should be submitted. Significant holes in the PNF must be closed to fully understand the scope of the project and whether or not MEPA applies.

- In Section 1.13.1, the Proponent states:

[4] 302 CMR 11.01(b)

> "The data collection process for the PNF occurred in November 2023. Due to the season and the fact that Franklin Park was not, and continues to not be at its most utilized, detailed traffic data was not collected within Franklin Park. During the peak 2024 Franklin Park season, the Proponent will collect traffic volume data within the park so that the Transportation Operations Plan can be better informed of the baseline conditions within the park."

We completely agree with the need to collect seasonally relevant transportation data. This new data should be collected and properly analyzed prior to any decision being rendered on this application.

- In Section 1.13.2, the Proponent states:

> "As part of the Project, the Humboldt Street turnaround at Seaver Street will be redesigned to facilitate rideshare pick up and drop off operations. These operations will all occur within the existing asphalt of the area. As part of that operation, the area will be modified to include one driveway at the Humboldt Avenue intersection, allowing for full vehicle maneuvers (right turn, through, and left turn) to and from the area. Please see Figure 1.13a for the design of the area. The drop-off operations design consists of a counterclockwise loop dropping off passengers on the southwest corner closest to the path into Franklin Park (and away from the driveway intersection with Seaver Street). The pick-up operation design includes perpendicular parking along the west side curb to allow passengers to access each vehicle, without impacting the circulation of the other vehicles.

While this statement is accurate on its face, it completely ignores the fact that absolutely no analysis has been presented as a basis of this design. It is presented in a vacuum without any assumptions, calculations, or validation. It is our opinion that this arrangement is likely to be a catastrophic failure, unable to process hundreds of rideshare arrivals and departures in the 60 minutes immediately prior to the games. There is not enough curb space. No capacity analysis of this very small intersection has been performed to verify that the number of vehicles needing to go in and out of this parking lot can be processed without seizing the intersection. In short, this is an ill-conceived and ill-designed location for rideshare operations.

- In Section 1.13.2, the Proponent also states:

> "Traffic enforcement is expected (for example, to assist pedestrians coming and going and to keep private vehicles out of Franklin Park) during events. The number and location of traffic enforcement details will be included in the TAPA. The currently expected locations of traffic control include Columbus Avenue/Seaver Street/Walnut Avenue, Seaver Street/Humboldt Avenue/Rideshare, Walnut Avenue/School Street, and Walnut Avenue/Park Lane/Franklin Park

Driveway as well as a number of locations within Franklin Park, most notably to protect existing parking not available for event spectators. Potential circulation modifications are still being discussed as well."

This narrative belies the incompleteness of this application. For instance, the number of locations of traffic enforcement officials "will be included in the TAPA." But a TAPA is supposed to memorialize what is included in Article 80 submissions. How can traffic enforcement be memorialized in a TAPA when this element which is essential to the plan has yet to be defined? Moreover, the traffic enforcement plan, as described, makes no mention of the crucial enforcement of no stopping or parking along roadways adjacent to the site to prevent drop-off/pickup activities. And this statement includes the very opaque terminology of "Potential circulation modifications are still being discussed as well." Any approvals granted at this time would require modification of the Article 80 approval and the corresponding TAPA and cannot be considered as commitments in the context of the application as filed.

- In Section 1.13.3, the Proponent states:

  "The shuttle volumes contained in the PNF included all vehicle trips associated with spectators. These include 89 buses from satellite parking, 52 buses from nearby T stations, and 177 TNC vehicles. To obtain vehicle trip totals, these vehicle numbers need to be doubled to account for trips in and trips out since the same vehicle will either not remain on-site (TNC) or will be making multiple trips (shuttle buses). However, this is expected to occur over an approximate 2 hour window (the traffic engineering standard time length for analysis purposes) so the peak hour vehicle trips were 159 in and 159 out.

  Since the submission of the PNF, through discussion with City staff, the numbers have been adjusted and it is anticipated that during a one hour period there will be approximately 170 trips in and 170 trips out (22 buses from nearby T stations and 50 from satellite parking). For this use, this activity is expected to occur for 2 simultaneous hours before the event."

First and foremost, the number of buses and TNC vehicles estimated by the Proponent in the PNF is highly questionable for all the reasons we articulated earlier in this memorandum. Second, the reduction in buses and an inverse relationship to the number of passenger vehicles that will arrive at the site. The number of buses from nearby train stations were reduced from 55 buses to 22 buses, representing a reduction of 33 buses or 1,650 passengers. The number of buses from satellite parking was reduced from 89 buses to 50 buses, representing a reduction of 39 buses or 1,950 passengers. This would mean, assuming the questionable occupancy rate of 2.8 passengers per vehicle, an increase in passenger vehicles arriving at the

site in the amount of 1,285 additional passenger vehicles. Surely this merits revisiting the already questionable traffic analyses presented in the PNF.

- In Section 1.13.4, the Proponent states:

  > "It is anticipated that 5% of the spectators will walk to the Stadium (this does not include those that take public transportation and then walk from stations and bus stops), and 5 percent will use bicycles. Although it is anticipated that there will be approximately 500 people biking (via private bikes and Bluebikes)."

  This estimate appears to be internally inconsistent with the Proponent's own site trip generation numbers. According to the trip generation analysis contained in the PNF, bicycle and walking travel was expected to contribute 1,640 trips out of 11,000 total trips. This would suggest a combined total of 15% of site generated trips by bicycle and on foot, whereas the statement in the Supplemental Information Document would suggest a combined total of 10%. Which is it?

Comments on White Stadium Renovation: Updates for Parkside (presentation dated July 10, 2024)

- The Proponent states "Boston Unity will invest in improved wayfinding and lighting around the Stadium, as called for in the Franklin Park Action Plan." The details of this commitment are not provided.
- The Proponent states "White Stadium will be carbon neutral." How is this possible when the site will generate 11,000 vehicle trips?
- The Proponent states "BUSP commits to using environmentally sensitive and practicable shuttles, aiming for electric shuttles within 3 years." This is effectively greenwashing with no firm commitment to conversion to electric shuttles.
- The Proponent suggests that the project will include "Bike infrastructure improvements to encourage biking and improve safety." Other than onsite improvements, which are the responsibility of the Proponent, all of the bike safety improvements are being implemented by the city through mechanisms unrelated to the project.
- The Proponent suggests that the project will include "Sidewalk and pedestrian safety improvements to encourage walking." Other than onsite improvements, which are the responsibility of the Proponent, all of the pedestrian safety improvements are being implemented by the city through mechanisms unrelated to the project.
- The Proponent guarantees "a reduction of shuttles from 57 to 40," on July 10, 2024, some 40 days after the Supplemental

Information Document was submitted. Does this control the number of approved shuttles? Does this apply to MBTA shuttles or satellite shuttles or both? This statement comes with no context and cannot reasonably be relied upon.

- The proponent states it will "Restrict traffic on Walnut Ave to only residents, shuttles, and emergency vehicles. This will reduce traffic from 600 vehicles per hour to 150 vehicles per hour." Notwithstanding the fact that the Proponent does not have the authority to make such a regulatory change without action on the part of the city to change traffic and parking regulations, this is a significant change that will substantially impact the number of site generated trips in the Walnut Avenue corridor. Where will these trips go? The Proponent has made no effort to analyze where these vehicles will be redirected to, never mind the resulting changes to traffic capacity, delays, and queues.

- The Proponent presents a "city preferred alternative" to the Walnut Avenue drop-off/pick-up circulation plan (see slide 31). This plan would have all shuttle bus traffic enter the site and exit the site from the intersection of Walnut Avenue at Park Lane and Pierpoint Road, instead of exiting at the north end of the site. This effectively *doubles* the site generated trips at the intersection of Walnut Avenue at Park Lane and Pierpoint Road. As noted previously, it is our opinion that the original plan would be calamitous from a traffic capacity and pedestrian safety point of view. This revision would materially and deleteriously impact this intersection.

- The slide on p.33 reflects 40 shuttle buses from the north on Columbus Avenue and Walnut Avenue. This information, dated July 10, 2024, is internally inconsistent with the information in the Supplemental Information Document, dated May 2024.

- On p.34, the Proponent states the plan "Reduces thru traffic: encourages significant reduction of thru traffic on circuit drive of other cars and shuttles." This is a conclusory statement without any analyses to support this assertion.

Comments on Jamaica Plain – White Stadium Neighborhood Transportation Workshop slides, dated April 10, 2024

- On p.17, Proponent compares the pedestrian plan for this project to the Gillette Stadium parking plan in terms of walkability. As the designer of the Gillette stadium parking plan, these plans bear no similarities. One is a march through remote parking lots; the other is a walk through neighborhood streets and multiple crossings of busy city streets. This is a very inapt comparison.

- On p.30, the Proponent suggests a "first level" strategy of parking enforcement including "Restrict parking and enforce no stopping on Walnut Ave from Montebello Road to Park Lane." Setting aside the fact that the Proponent does not have the authority to implement this without parking regulations being adopted by the city and corresponding enforcement, this is a

nearly impossible task. As the Traffic Director of nearby Somerville, we could not control pick-up/drop-off activity at elementary schools, never mind a long stretch of city streets. It would require many parking enforcement officers to make an even modest difference in this area. It is also notable that the Proponent does not commit to paying for the overtime for the required parking enforcement officers.

- Also on p.30, the Proponent suggests a "third level" strategy of "physically barricade oncoming traffic (on Walnut Avenue) except for residents, except shuttles, emergency vehicles, and residents." This approach borders on unlawful, as these are public ways paid for by the taxpayer. It also is internally inconsistent with the PNF and the Supplemental Information Document.

Comments on Memorandum from BPDA Transportation Planning and the Boston Transportation Department, dated February 5, 2024, SUBJECT: Boston Unity Soccer Partners - White Stadium PNF Transportation Comments

Without getting into the details of this memorandum, it is obvious that the Proponent has not adequately responded to the city's own transportation agencies. As one example, the city staff requested that the Proponent:

> "Provide a full design of the proposed shuttle access roads and terminals (both at northwest corner of site by Walnut Avenue and to the south at Circuit Drive), including dimensions, number of berths, pedestrian access routes to/through the terminals, alignment of access routes, proposed curb cuts, etc. This plan should identify any proposed curb work, pavement markings, lighting, materials, and signage. If flush conditions are proposed, details that provide clarity for different modal users (i.e. shuttles or pedestrians) should be provided and should take into consideration the needs of people with vision disabilities."

It is clear that that Proponent is not even responsive to its own partner in the project.

Comments on White Stadium Transportation Plan Update (For Public comment) dated April 2025

- On page 3, the proponent makes the only attempt to quantify the number of net new trips. The document includes a table which represents that 4400 spectators will arrive by shuttle from remote lots, 2200 spectators will arrive by shuttle bus from MBTA stations, 2200 will walk from an MBTA station, 1100 will walk/bike, and 1100 will take a rideshare. It is important to note that this mode share estimate is yet another departure from the original trip generation estimate and each subsequent trip generation estimate. At this point, it is hard to take any of these trip generation analyses at face value as the Proponent has abandoned any pretense of using a scientific method to project the number of new trips the site will generate

for the soccer matches. It is also important to note that the Proponent has made no effort to analyze the number of new site generated trips that would be generated by a concert on the site or to provide any traffic analyses to correspond to those new concert generated trips.

- The Proponent did not submit ANY traffic analyses for this version of the plan. In fact, they have not submitted any traffic analyses since the original submission and there have been multiple iterations. This is in direct contravention of the policies of the Boston Transportation Department, which requires a Traffic Impact and Access Study (TIAS) conforming with current industry standards to be completed in conjunction with a project of this size and scale.
- A quick review of the trip generation estimates submitted with this document reveal the following troubling issues requiring further analysis:
    - The proponent estimates that there will be 44 MBTA shuttles in the 2 hours before the game. That is one shuttle every 3 minutes.
    - The document does not say how many shuttles will come from remote lots, but assuming a capacity of 50 passengers, which would be 88 buses. That would result in one shuttle bus arrival every minute and a half.
    - Combined, the MBTA shuttles and the remote lot shuttles would be more than one shuttle per minute arriving at the site and departing the site. There is nowhere near enough curb space to permit this volume of buses to arrive on the site, especially given a 3-5 minute dwell time on site for each shuttle bus to pick-up or discharge passengers.
    - The proponent estimates 1100 walking/biking trips in the 2 hours before a game. This equates to just under 10 peds/bikes per minute. If these trips are combined with the 2200 pedestrians walking from nearby MBTA stations, the result would be just under 30 pedestrians per minute on average, with much higher volumes during the peak 15 minutes.
        - That is a lot of pedestrian crossings across Walnut Ave. Their previous plan to manage pedestrian crossings on Walnut Ave was woefully deficient.
        - No pedestrian traffic management plan improvements have been articulated.
    - The 1100 rideshare trips estimated by the Proponent could be the worst aspect of this plan. Their plan would amount to just under 10 rideshare trips per minute. There is nowhere near enough curb space to accommodate this volume

on the revised site plan.

- On page 8, the Proponent is still making very vague statements about their obligations and commitments to traffic mitigation. It is unclear if and how these statements can be incorporated into a Transportation Access Plan Agreement (TAPA). To date, no Draft TAPA has been circulated pursuant to the Article 80 Process.
- The Proponent continues to rely on unidentified satellite parking lots. Because we do not know where these lots are going to be, we cannot know if these lots cause segmentation as pertains to MEPA approval or a new permit in a host community based on the host community's zoning ordinances/bylaws. Do any of these lots need to be constructed? Are these lots permitted for this type of use in their respective municipalities? Are any of these lots state owned parking lots, thereby triggering MEPA review?

Conclusion

The materials submitted in support of this application are fundamentally incomplete, largely inaccurate, and poorly supported. The changes made throughout the public process have resulted in a fundamentally different project from a transportation perspective. As it is, the PNF and the materials submitted to supplemental application are internally inconsistent and in many ways in conflict. As a result, the Proponent should be required to restate the transportation aspects of the project and reanalyze all of the traffic impacts of the project, so the public has a fundamental understanding of the traffic impacts and traffic mitigation commitments flowing from this application. All future analyses should be required to comply with current practice in traffic engineering, including the use of accepted scientific methods to estimate and analyze the impacts of the project on the local neighborhood and adjacent roadway network.

In addition, the Applicant should be required to supplement vaguely defined information relative to satellite parking lots, shuttle routes, and shuttle operations at MBTA facilities so that the full scope of the required permits will be understood. There is ample evidence that MEPA jurisdiction applies, but the Applicant has withheld critical information required to make this determination. The project is either inadequately developed for consideration by the BPDA or it is intentionally withholding data adverse to the permitting path for the project. In either case, this project should not proceed until the essential information is provided.