

# ARCHITECTURAL ACCESS BOARD- HEARING PACKET

Name	<b>White Stadium</b>	Docket #	V 25 - 090
Address	<b>450 Walnut Avenue</b>	Docket #	C -
City	<b>Boston</b>	Hearing	1/26/2026
Bldg Type		Time of hearing	<b>1:00 PM</b>
Complaint's Name		Plans on file?	
Complaint ?	Variance ?	Request for continuance?	
Jurisdiction:	3.3.2	If the work performed amounts to 30% or more of the full and fair cash value of the building, the entire building is required to comply with 521 CMR.	
Building Permits:	FND1807280 ERT1691970 ERT1783700		
Assessed Value:	FDN1772273	Anticipated construction cost: \$183,500,000	

**Exhibit: 1**

V25-090

AAB 1-47

## Variances to be addressed:

Petitioner seeks relief from: 27.4.1: Location: Stairways shall have continuous handrails at both sides of all stairs. The inside handrail on switchback or dogleg stairs shall always be continuous

On May 16, 2025 the Board received an application for variance for the above referenced address and at the June 2, 2025 meeting the Board Continued to request Petitioner provide the Board with: a feasibility study on non-continuous handrails on either side, and confirmation from the responsible local building official that this would not be an acceptable compliance alternative. (See AAB 31-47)

On August 22, 2025 the Board received a response from the applicant and at the September 8, 2025 meeting the Board voted to Grant relief on the condition that Option B is used. (See AAB 23-30)

On September 25, 2025 the Board received a request for an adjudicatory hearing and on September 25, 2025 Notice was sent to all appropriate parties. (See AAB 18-22 )

On January 9, 2026 the Board received an amended application and additional information from the applicant. (See AAB 2-17)

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**Variance Application - 450 Walnut Avenue, Boston, MA 02130**


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**From** Sippel, Meagan <Meagan.Sippel@stantec.com>

**Date** Fri 1/9/2026 1:18 PM

**To** Joyce, William (DPL) <William.Joyce@mass.gov>; Griffin, Molly (DPL) <Molly.Griffin@mass.gov>; Ronan, Brian (EXT) <brian.ronan@boston.gov>; ada@boston.gov <ada@boston.gov>; Michael Muehe <Mmuehe@bostoncil.org>

**Cc** Roy, Tamara <Tamara.Roy@stantec.com>; John Martino <johnm@ablecompany.us>; Scott Freedman <sfreedman@LegendsGlobal.com>; Lukas Stauffer <lstauffer@LegendsGlobal.com>; Kathryn Denis <kdenis@kmaccess.com>; Josh Safdie <jsafdie@kmaccess.com>; Sam Valentine <sam.valentine@boston.gov>; Luke Hines <luke.hines@boston.gov>; Cochran, Kris <kcochran@moodynolan.com>; Dan Ollila <dan@jonesarch.com>; Roberson Castor <roberson.castor@boston.gov>

 4 attachments (4 MB)

Form-AAB-Amendment-Variance V25-090\_White Stadium\_12.22.25.pdf; V25-090 Amendment Narrative\_12.22.2025.pdf; Figure 1.pdf; Figure 2.pdf;

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Please find the MAAB Amended Variance Application – Hearing date set for 1/26/2026 for the White Stadium project.

**Attached:**

1. Amended Application for Variance
2. Amended Narrative
3. Figure 1
4. Figure 2

Thank you and have a wonderful weekend!

Thanks,

**Meagan Sippel**

Associate

Direct: (617) 575-3331

Mobile: (617) 842-7289

[meagan.sippel@stantec.com](mailto:meagan.sippel@stantec.com)

**Stantec Architecture and Engineering P.C.**

40 Water Street, Third Floor, Boston MA 02109-3604, United States





**With every community, we redefine what's possible.**

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## **V25-090: White Stadium, 450 Walnut Avenue, Boston**

### **Variance Amendment Request**

White Stadium, located at 450 Walnut Ave in Boston, Massachusetts, is owned and operated by the Boston Public Schools (BPS) and serves as the primary athletic facility for the BPS Athletics Department and all BPS sports teams from grades 7-12. For decades, White Stadium has supported student athletics, school events like graduations, and community programming; however, years of deferred investment have deteriorated the facility to such poor condition that it can no longer adequately serve students, staff or the public. The current conditions severely limit the ability to offer robust programming: only four sports teams—out of dozens citywide—were able to practice at a stadium with 10,000 seats on a consistent basis.

To help revitalize White Stadium, the [City of Boston released an RFP](#) in June 2023 seeking a partner to reconstruct and lease the West Grandstand. As a result, the White Stadium Redevelopment project is a public-private partnership between the City of Boston and Boston Legacy Football Club (BLFC). The West Grandstand is being constructed by Able Company and represents the privately funded portion of the project, while the East Grandstand represents the City-funded construction of the project. The City of Boston through Boston Public Schools will retain ownership and operational control of the facility to function as a year-round BPS Athletics hub operating seven-days a week for extended daily hours. The West Grandstand portion of the stadium will be leased and licensed to BLFC for a limited number of home games each year, subject to defined protections, community benefits, and public-use safeguards.

As a whole, the project will replace the existing bench-style seats with approximately 10,000 bucket-style seats, add BPS-dedicated spaces, build BLFC team and fan programming, and provide weather-protected spectator seating on both East and West Grandstands

### **Purpose of Amendment**

The scope of work at White Stadium exceeds 30% of the building's *full and fair cash value*, which subjects the project to full compliance with 521 CMR.

The City of Boston and Boston Legacy Football Club (BLFC) respectfully submit this variance amendment to:

1. Provide additional detail on the Fixed Seating on the East Grandstand; and
2. Add supplemental information on Mobile Telescopic Seating that will be deployed from the East and West Grandstands, and throughout the Stadium. *These seating configurations raise the same handrail variance currently requested for the West Grandstand Side of the stadium.*

### **Request 1: Variance not to provide continuous handrails on both sides of the stairs in spectator seating areas [521 CMR 27.4.1]**

Code References:



521 CMR 27.4.1 states in part: "*Stairways shall have continuous handrails on both sides of all stairs.*"

The project team fully acknowledges and supports the purpose of 521 CMR 27.4.1: to ensure safe, dignified, and independent access for individuals with mobility impairments and others who benefit from handrail support. Accessibility and inclusion are central goals of this project, particularly given White Stadium's role as a public school facility serving students, families, and community members.

The requested variance is not sought to diminish accessibility, but rather to reconcile a conflict between accessibility regulations and stadium-specific life-safety codes, while preserving functional access to seating, structural integrity, and long-term public benefit.

### Background & Timeline

- In May, 2025: White Stadium requested relief from providing continuous handrails on both sides of the stepped aisles in order to follow the MA. Building code, which requires a continuous center handrail at stadium stepped aisles. Adding continuous side handrails as stated in 521 CMR 27.4.1 is technologically infeasible given that the continuous railings would make access to the seats impossible.
- In June 2025: MAAB continued the variance request, asking for a "feasibility study of non-continuous handrails on either side (of the stepped aisle) and confirmation from the responsible local building official that this would not be an acceptable compliance alternative".
- Subsequently, the White Stadium team provided a [letter](#) to MAAB from the Deputy Commissioner/Inspector of Boston Building Inspectional Services, Marc Joseph, stating that according to 780 CMR, thru reference to the 2017 ICC 300 Standard, that "where seats are located on both sides of a stepped aisle, a minimum of one mid-aisle handrail shall be provided". And, the West side of White Stadium provided a feasibility study of lost seating to the West side, which showed that the request for (2) non-continuous side handrails requires widening the stepped aisles by 4" to achieve required clearances, resulting in significant impact in loss of seats and annual revenue.
- In the August MAAB submission, Boston Legacy Football Club also outlined a series of proactive measures to support stadium visitors with a range of mobility needs.

In this amendment, we seek to further expand upon the analysis previously submitted by illustrating the impacts of non-continuous handrails on the City-funded East grandstand. Please refer to the next section for a detailed description and drawings of the East Side.

As noted in the continuance for the West Grandstand, the City of Boston and BLFC remain fully committed to ensuring that White Stadium is inclusive and welcoming to persons with disabilities. Consistent with the currently adopted version of ICC 300 in Massachusetts, the project proposes to provide continuous center handrails in stepped aisles as the appropriate and code-aligned accessibility solution.

### Relevant New Information:

In addition to the seating already described in the original application for the West Grandstand, the East Grandstand includes 5,100 bucket seats distributed among 3 levels. Approximately 3,350 of these seats will be located on levels which include double-loaded stairs that lead to stepped seating on either side.

Based on previous discussions with the Board for the West Side, we have reviewed the feasibility of providing two non-continuous side handrails at the stairs, see **Figure 1**. Widening the stairs to 56", as required to meet the minimum 48" between handrails for egress, will result in the loss of approximately 117 seats to the East Grandstand. Each seat brings in approximately \$70 per game. White Stadium can host up to 20 BLFC games per season. Therefore, providing the two handrails would result in White Stadium losing approximately \$163,800 per year on the East Grandstand. Considering the 10-year lease term for BLFC, this could result in a total loss of up to \$2,709,000 for White Stadium, or \$270,900 per year when you add the East Grandstand loss with the estimated \$107,100 loss of the West Side. It is our opinion that this total annual revenue loss is significant. Because White Stadium is a publicly owned asset operated through a public-private partnership, this loss would directly impact the City of Boston's long-term financial sustainability of the facility and, by extension, its ability to support BPS athletics and community programming.

We have also asked the Deputy Building Commissioner of the City of Boston, Marc Joseph, whether complying with the 2023 version of ICC 300 would be an acceptable compliance alternative. He submitted a letter to the Board on October 17, 2025 that reiterates the currently adopted version of ICC 300 requires a mid-aisle handrail.

Center handrails were designed based on previous experience, industry standard, and to meet the requirements of the current ICC-300 code. The current ICC-300 code requires stepped aisles to provide center handrails at grandstands and has separate requirements for stairs. The stadium layout and structure are informed by the aisle locations. There are structural columns aligned with the center of the aisles with the proposed center handrails. Modifying the aisles and handrails to accommodate non-continuous side handrails, as described above, will involve significant redesign.

### Proposed Compliance Alternative and Mitigation Measures

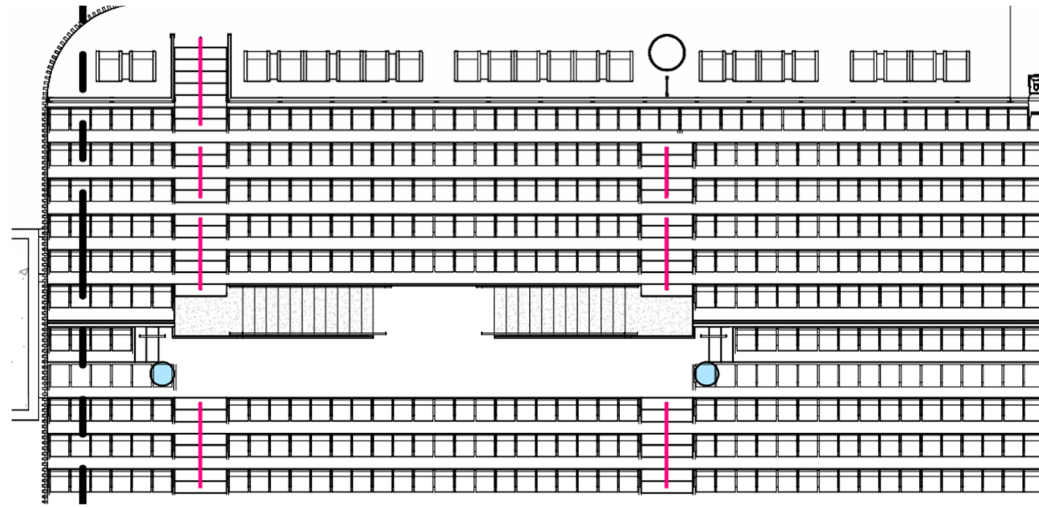
We are proposing to provide a center handrail, as required by the current ICC-300 Code. As a compliance alternative, we are proposing the following accessibility enhancements for both the East & West Sides:

- Trained ushers to escort guests to and from their seats on NWSL game days, when the stadium is most full.
- Subject to availability, ensuring that guests can purchase seats at their desired price level when accessible seating is preferred
- Advance phone assistance to discuss routes of travel and seating options, with priority access for season ticket purchases

- Clear, transparent accessibility information posted on the stadium website, including diagrams identifying center handrail locations to support informed seat selection.
  - The following is provided as an example of website content:

*White Stadium has center handrails at the stairs leading to stepped seating in the Main and Upper Concourse Levels. Below is a sample of the location of these center handrails on the Main and Concourse Levels so guests can make an informed decision regarding seat selection.*

*Example clip identifying center handrails:*



*\*Note: the website is still in development, this clip is intended to provide a graphic sample of the information to be provided.*

### Summary

It is *technologically infeasible* to provide continuous handrails at both sides of the stairs while still providing access to the seating rows the stairs serve. Given these facts, we humbly request a variance from the requirements of 521 CMR 27.4.1 on the basis of *impracticability*.

In addition, providing non-continuous handrails at the fixed seating areas would result in a seat loss of approximately 219 seats and an estimated total revenue loss of approximately \$2,709,000 over the 10-year lease term with BLFC. The City of Boston would be directly impacted by this potential revenue loss.

The Board has also received a letter from Marc Joseph, the Deputy Building Commissioner of the City of Boston, stating center handrails are required by the current version of ICC 300. In light of this code requirement, the documented structural and operational impacts, and the accessibility mitigation measures proposed by the project, the incremental benefit of non-continuous side handrails over center handrails is not substantial. Therefore, we are proposing to provide a center handrail, as required by the current version of ICC 300 and in alignment with accepted industry standards for assembly occupancies.

## **Request 2: Variance not to provide continuous or non-continuous handrails on both sides of the temporary Mobile Telescopic Seating areas [521 CMR 27.4.1]**

### Code References:

521 CMR 27.4.1 states in part: "*Stairways shall have continuous handrails on both sides of all stairs.*"

### Relevant Information:

In addition to the fixed grandstand seating areas, temporary Mobile Telescopic Seating will be deployed at White Stadium by BLFC for a limited number of home games each year, see **Figure 2**. Approximately 3,900 Telescopic seats will be provided, which include double-loaded stairs that lead to stepped seating on either side.

Continuous side handrails are required by 521 CMR, which are not feasible at assembly seating. In addition, the team cannot find any commercially available models of temporary Mobile Telescopic Seating that have broken side handrails. Therefore, we are proposing to provide center handrails at the temporary Mobile Telescopic Seating, see **Figure 3**. Center handrails at temporary Mobile Telescopic Seating are commercially available and in line with the Deputy Building Commissioner of the City of Boston's October 17, 2025 letter to the Board.

### Compliance Alternative:

In addition to the compliance alternatives described for the East and West Side Grandstand fixed seating, we are proposing to include information about the temporary Mobile Telescoping Seating handrails and locations on the website.

### Summary

It is *technologically infeasible* to provide continuous handrails at both sides of the stairs at the temporary Mobile Telescopic Seating while still providing access to the seating rows the stairs serve. Given these facts, we humbly request a variance from the requirements of 521 CMR 27.4.1 on the basis of *impracticability*.

In addition, non-continuous side handrails for temporary Mobile Telescopic Seating are not readily available on the market. Therefore, we propose providing center handrails at the temporary Mobile Telescopic Seating which are in line with the October 2025 letter to the Board from the Deputy Building Commissioner of the City of Boston.



**Commonwealth of Massachusetts  
Division of Occupational Licensure  
Office of Public Safety and Inspections  
Architectural Access Board**

1 Federal St., Suite 0600 • Boston • MA • 02110-2012  
V: 617-727-0660 • [www.mass.gov/aab](http://www.mass.gov/aab)

Docket Number

(Office Use Only)

**AMENDED APPLICATION FOR VARIANCE**

**INSTRUCTIONS:**

- 1) Answer all questions on this application to the best of your ability.
  - a. Information on the Variance Process can be found at:  
<https://www.mass.gov/guides/applying-for-an-aab-variance>.
- 2) Attach whatever documents you feel are necessary to meet the standard of impracticability laid out in 521 CMR 4.1. You must show that either:
  - a. Compliance is technologically infeasible, or
  - b. Compliance would result in an excessive and unreasonable cost without any substantial benefit for persons with disabilities.
- 3) Sign the certification on Page 6.
- 4) Serve copies of the completed application and all attachments via electronic or physical delivery based on the recipient's preference to:
  - a. Local Building Department,
  - b. Local Commission on Disability (if applicable in the town where the project is located) (A list of all active Disability Commissions can be found at: <https://www.mass.gov/commissions-on-disability>), and
  - c. The Independent Living Center (ILC) for your area.  
(Your ILC can be found at: <http://www.masilc.org/findacenter>.)
- 5) Complete the Service Notice included with the Application and sign it.
- 6) Deliver the completed Application and all attachments to the Board via electronic or physical delivery:
  - a. Electronic:
    - i. Applications should be sent via email to [william.joyce@mass.gov](mailto:william.joyce@mass.gov) & [molly.griffin@mass.gov](mailto:molly.griffin@mass.gov).
    - ii. The email submission must have the subject line: Variance Amendment - <Docket Number>
    - iii. The application and all attachments must be in .pdf format
    - iv. The application and all attachments should be included in a single email, except where that email would exceed 15 megabytes in size.
  - b. Physical
    - i. Applications should be sent to the mailing address listed above and must include:
      1. The completed application and all attachments.
      2. A copy of the application and all attachments on a CD/DVD (Thumb Drives will not be accepted),
      3. The completed and signed Service Notice.
    - ii. Please ensure that all documents included are no larger than 11" x 17".
    - iii. Incomplete applications will be returned via regular mail to the applicant with an explanation as why it was unable to be docketed.

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In accordance with M.G.L., c.22, § 13A, I hereby apply for modification of or substitution for the rules and regulations of the Architectural Access Board as they apply to the building/facility described below on the grounds that literal compliance with the Board's regulations is impracticable in my case.

1. State the name and address of the building/facility:

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2. What is the docket number of the existing variance V\_\_\_\_ - \_\_\_\_\_

3. Briefly describe the extent and nature of the new work performed or to be performed since your original application (use additional sheets if necessary):

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4. a. Has the Board's Jurisdiction changed since your original application: Yes                      No

b. If Yes, which section of the Board's Jurisdiction (*see Section 3 of the Board's Regulations*) has now been triggered?

2.6 ☐ 3.2 ☐ 3.3.1(a) ☐ 3.3.1(b) ☐ 3.3.2 ☐ 3.3.4 ☐ 3.4 ☐

5. List **all** building permits that have been applied for since the date of your original application or last amendment, include the issue date and the listed value of the work performed:

**Permit #**

**Date of Issuance**

**Value of Work**

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*(Use additional sheets if necessary.)*

6. List the anticipated construction cost for any new work not yet permitted:

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7. For existing buildings, state the current actual assessed valuation of the **BUILDING ONLY**, as recorded in the **Assessor's Office** of the municipality in which the building is located:

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Is the assessment at 100%? \_\_\_\_\_

If not, what is the town's current assessment ratio? \_\_\_\_\_

8. State the phase of design or construction of the facility as of the date of this application:

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9.

<b>Request #1</b>	<b>Types of Attachments for this Request:</b> [ ] Floor/Site Plans, [ ] Cost Estimates, [ ] Photographs, [ ] Test Drawings, [ ] Other(s): _____
Section(s) for which you are seeking relief: _____	
Are you seeking temporary relief <input type="radio"/> Yes <input type="radio"/> No	
If yes, when do you propose to be in compliance by: _____	
Please describe in detail why compliance with the Board's regulations are impracticable (as defined in 521 CMR 5) for the subject of this request, and attach whatever documents are relevant to support your argument that compliance is impracticable (attach additional pages if necessary, please identify which request each attachment is in support of):	
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<b>Request #2</b>	<b>Types of Attachments for this Request:</b> [ ] Floor/Site Plans, [ ] Cost Estimates, [ ] Photographs, [ ] Test Drawings, [ ] Other(s): _____
Section(s) for which you are seeking relief: _____	
Are you seeking temporary relief <input type="radio"/> Yes <input type="radio"/> No	
If yes, when do you propose to be in compliance by: _____	
Please describe in detail why compliance with the Board's regulations are impracticable (as defined in 521 CMR 5) for the subject of this request, and attach whatever documents are relevant to support your argument that compliance is impracticable (attach additional pages if necessary, please identify which request each attachment is in support of):	
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Request #3

Section(s) for which you are seeking relief: \_\_\_\_\_

Are you seeking temporary relief     ☐ Yes     ☐ No

If yes, when do you propose to be in compliance by: \_\_\_\_\_

Please describe in detail why compliance with the Board's regulations are impracticable (as defined in 521 CMR 5) for the subject of this request, and attach whatever documents are relevant to support your argument that compliance is impracticable (attach additional pages if necessary, please identify which request each attachment is in support of):

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Types of Attachments for this Request:

☐ Floor/Site Plans, ☐ Cost Estimates,  
☐ Photographs, ☐ Test Drawings,  
☐ Other(s): \_\_\_\_\_

Request #4

Section(s) for which you are seeking relief: \_\_\_\_\_

Are you seeking temporary relief     ☐ Yes     ☐ No

If yes, when do you propose to be in compliance by: \_\_\_\_\_

Please describe in detail why compliance with the Board's regulations are impracticable (as defined in 521 CMR 5) for the subject of this request, and attach whatever documents are relevant to support your argument that compliance is impracticable (attach additional pages if necessary, please identify which request each attachment is in support of):

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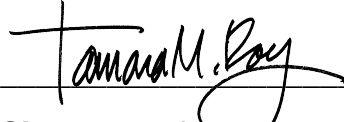
Types of Attachments for this Request:

☐ Floor/Site Plans, ☐ Cost Estimates,  
☐ Photographs, ☐ Test Drawings,  
☐ Other(s): \_\_\_\_\_

If you require more than 4 requests, please use the *Additional Request Sheet* and complete the *Large Variance Tally Sheet*, both of which are available on the “Forms and Applications” page of the Board’s website (<http://www.mass.gov/aab>).

I DECLARE UNDER THE PENALTY OF PERJURY THAT THE INFORMATION PROVIDED IN THIS APPLICATION AND SUPPORTING DOCUMENTATION IS TRUE AND CORRECT

Date: \_\_\_\_\_



Signature of owner or authorized agent (required)

PLEASE PRINT:

\_\_\_\_\_  
Name

\_\_\_\_\_  
Organization (If Applicable)

\_\_\_\_\_  
Address

\_\_\_\_\_  
Address 2 (optional)

\_\_\_\_\_  
City/Town

State

Zip Code

\_\_\_\_\_  
E-mail

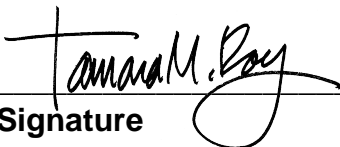
\_\_\_\_\_  
Telephone

# SERVICE NOTICE

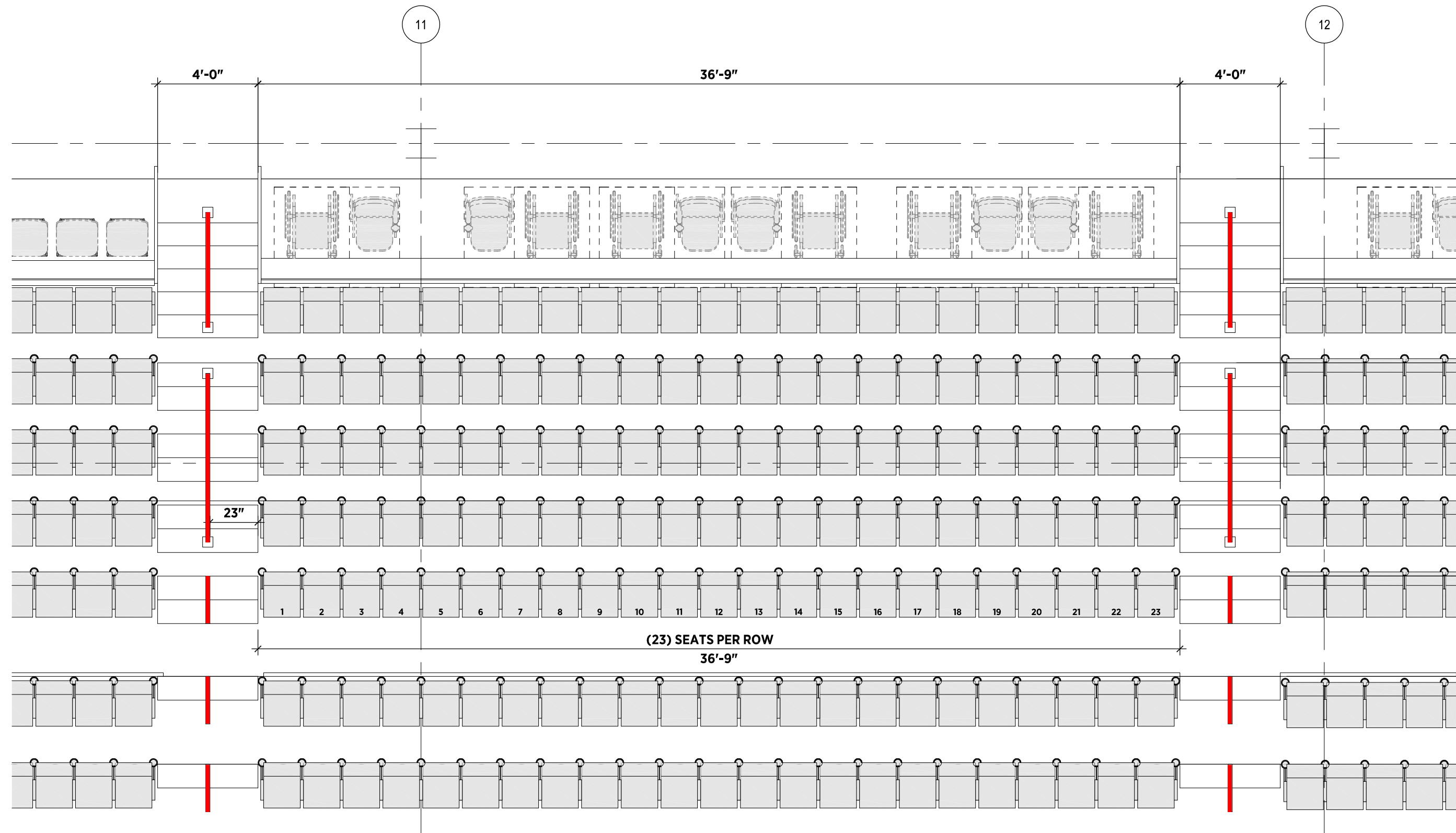
I, \_\_\_\_\_, as \_\_\_\_\_  
(Name) (Relationship to the applicant)

HEREBY CERTIFY UNDER THE PAINS AND PENALTIES OF PERJURY THAT I SERVED OR CAUSED TO BE SERVED, A COPY OF THIS VARIANCE APPLICATION ON THE FOLLOWING PERSON(S) IN THE FOLLOWING MANNER:

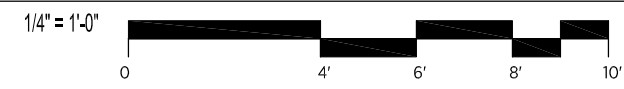
<u>NAME AND ADDRESS OF PERSON OR AGENCY SERVED</u>		<u>METHOD OF SERVICE</u>	<u>DATE OF SERVICE</u>
<b>1</b> Building Department			
<b>2</b> Local Commission on Disability (If Applicable)			
<b>3</b> Independent Living Center			

  
Signature

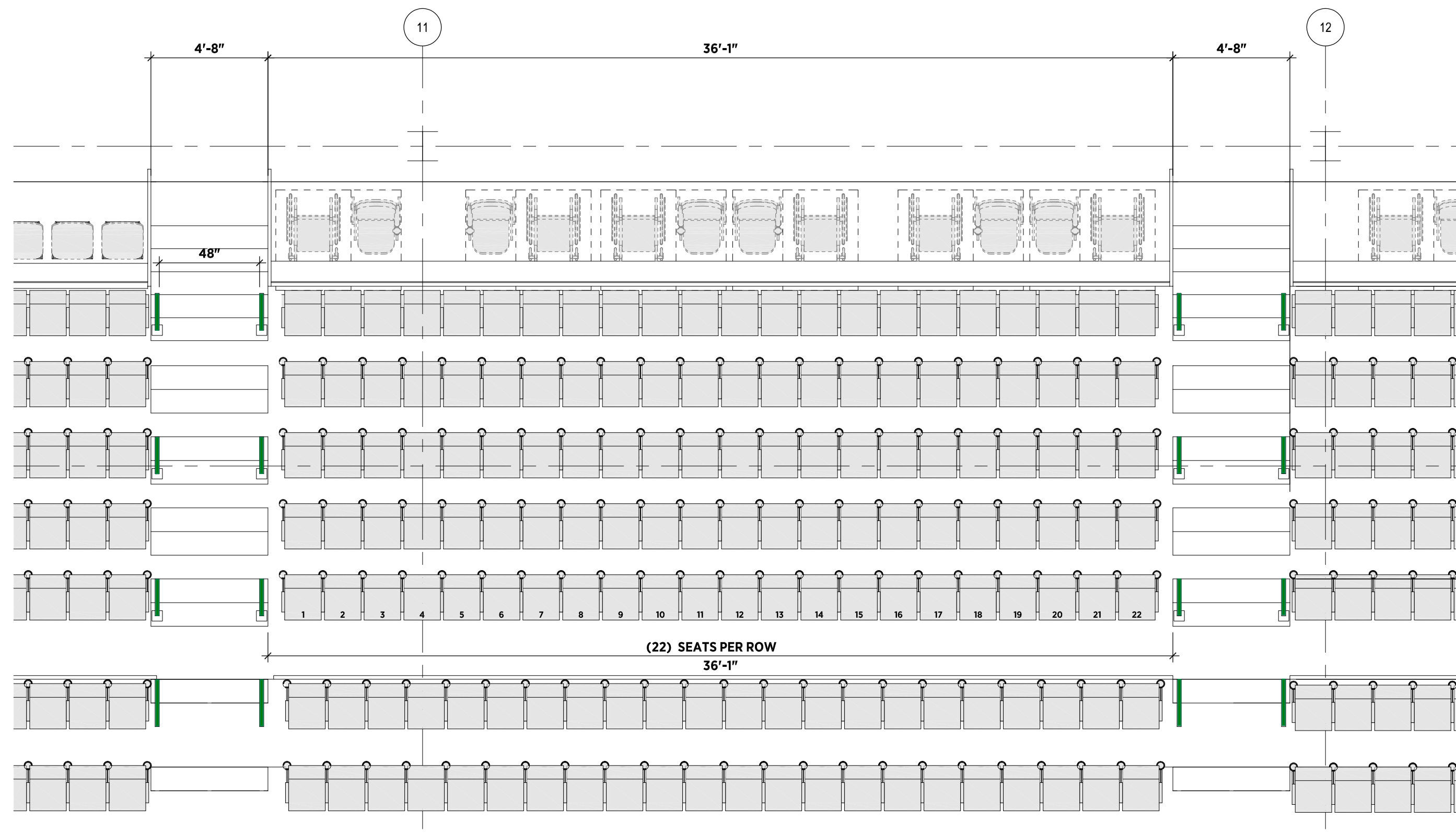
\_\_\_\_\_  
Date



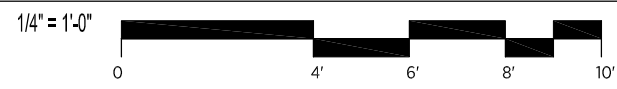
1 TYPICAL LOWER BOWL SEATING PLAN: OPTION 1 - CENTER HANDRAIL



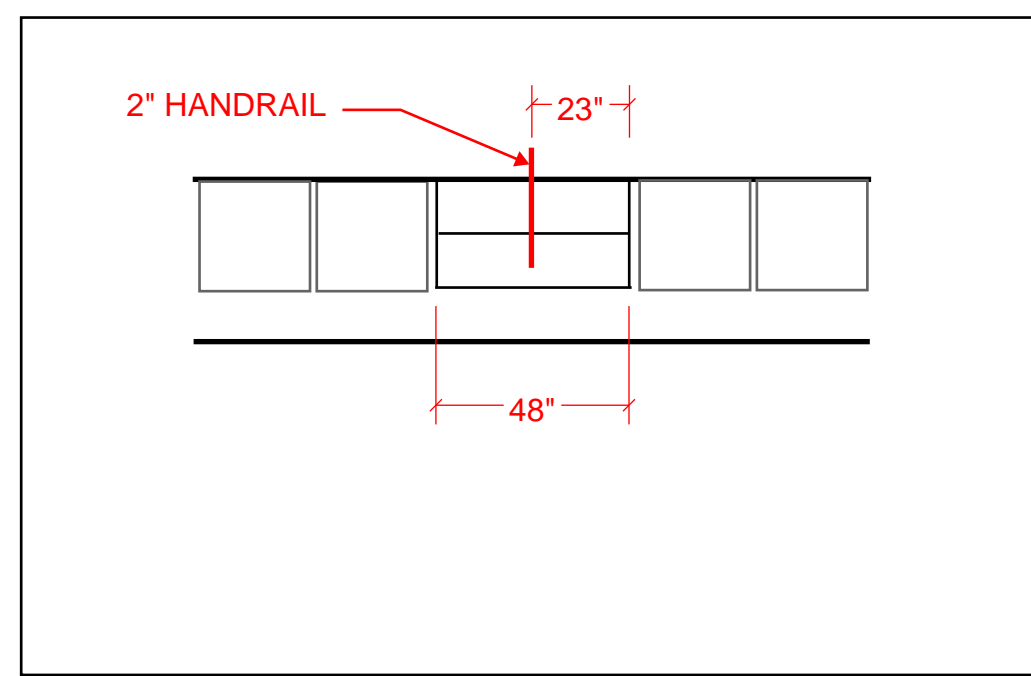
Consider only the red rails  
No change to seat count



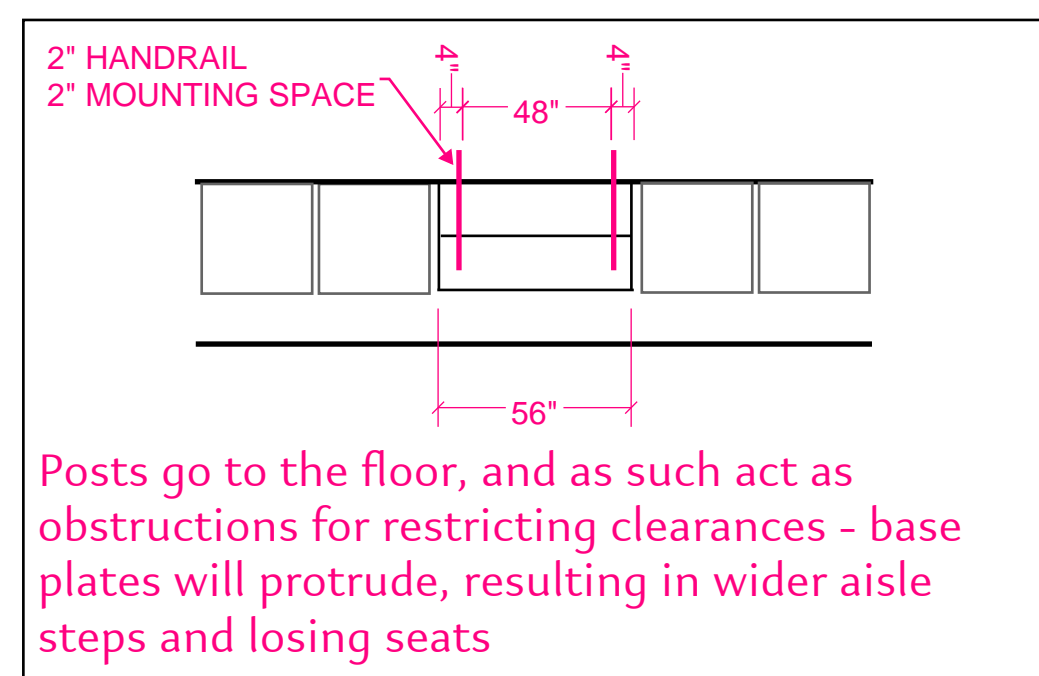
2A TYPICAL LOWER BOWL SEATING PLAN: OPTION 2A - HANDRAIL BOTH SIDES, EVERY OTHER ROW



Consider only the green rails  
Lose (1) seat per row, loss of 117 seats

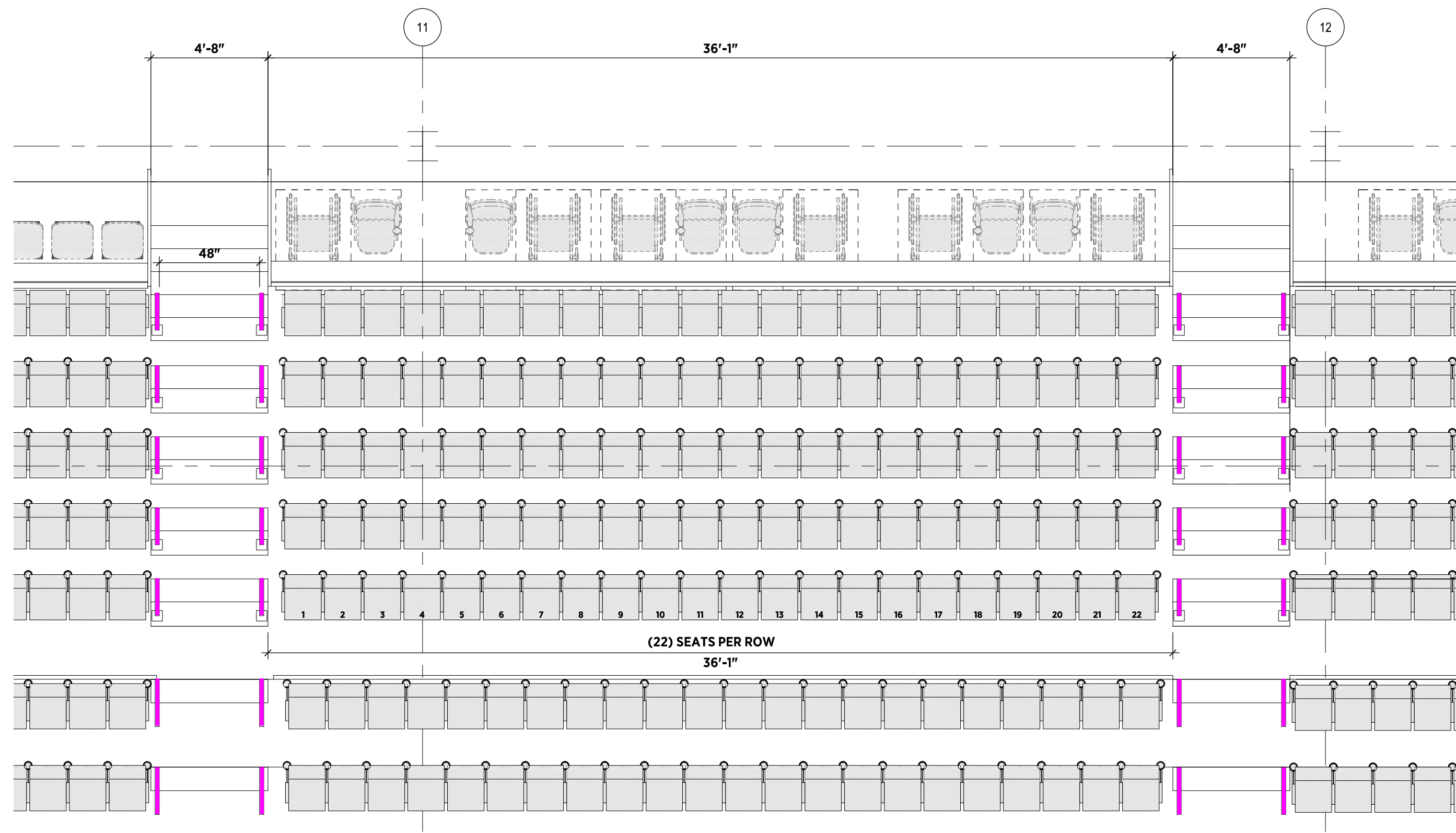


OPTION 1

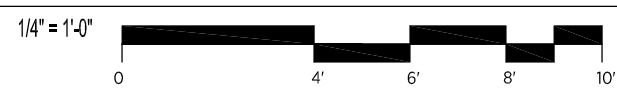


OPTION 2A & 2B

HANDRAIL DIAGRAMS - NOT TO SCALE



2B TYPICAL LOWER BOWL SEATING PLAN: OPTION 2B - HANDRAIL BOTH SIDES, EVERY ROW



Consider only the pink rails  
Lose (1) seat per row, loss of 117 seats

DATE:  
01/07/2025

DRAWING TITLE:  
Handrail Diagrams

Project:  
White Stadium Renovation

Client:  
White Stadium  
City of Boston Public  
Facilities Department

JONES  
ARCH

978.744.5200  
www.jonesarch.com

AAB 16

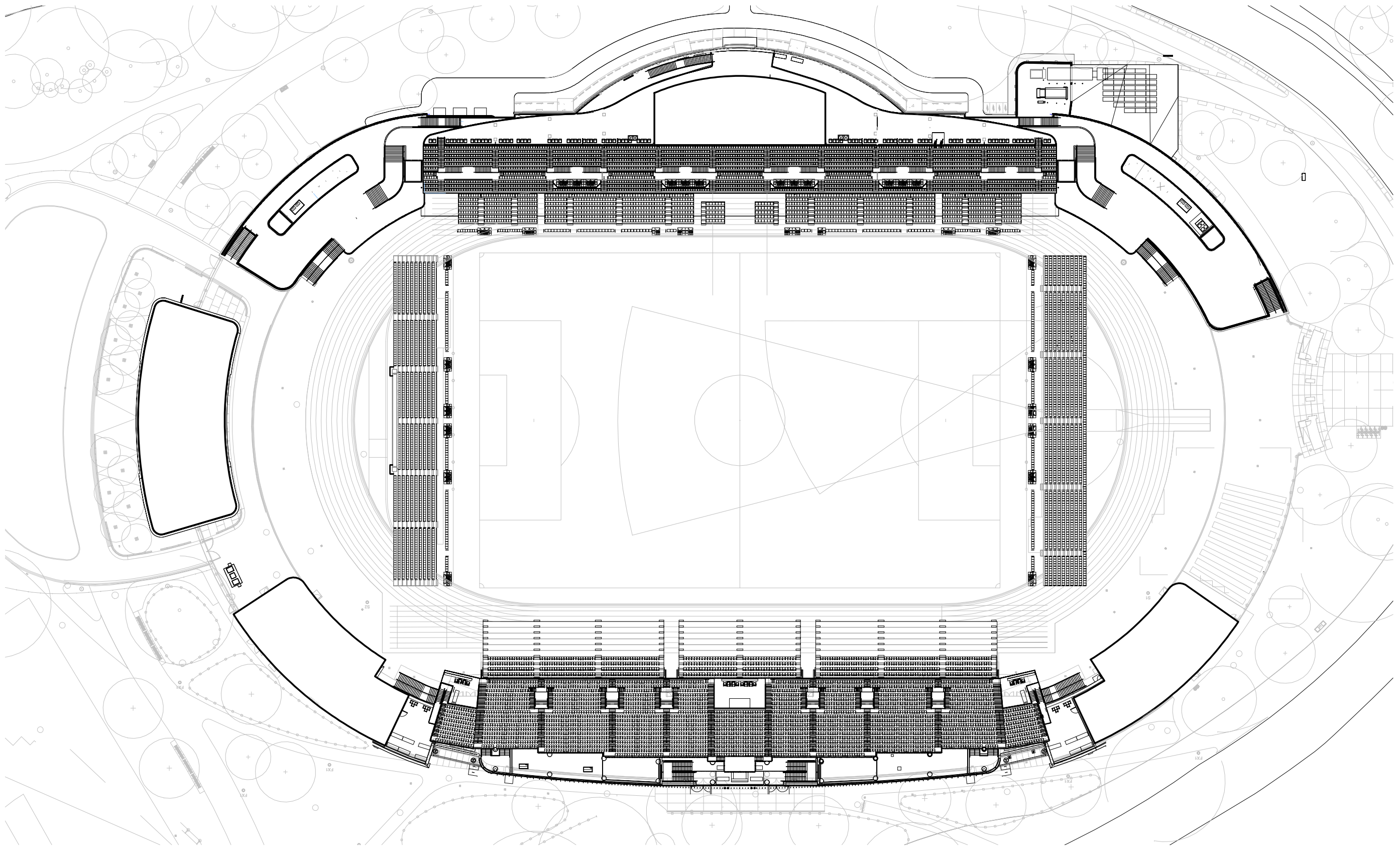
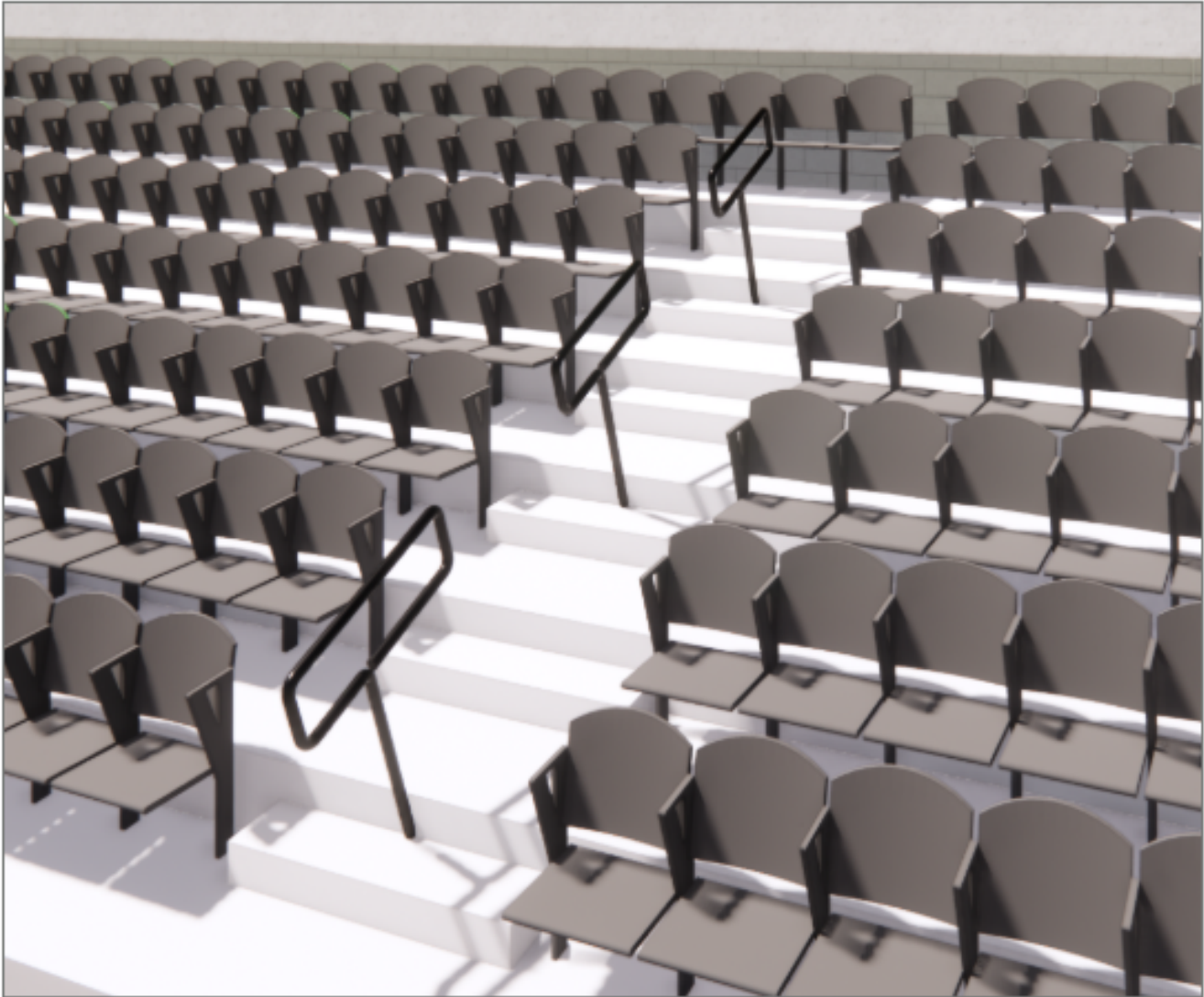


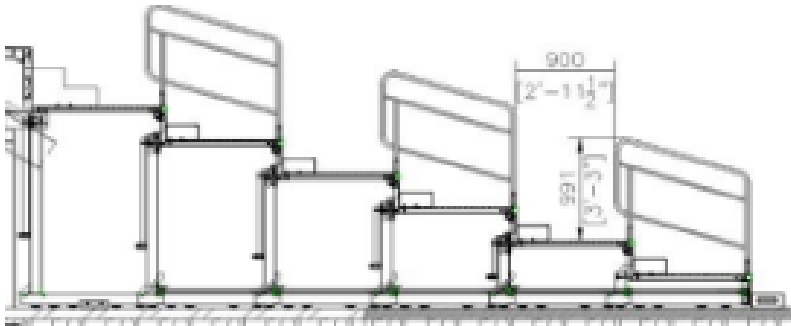


Figure 3



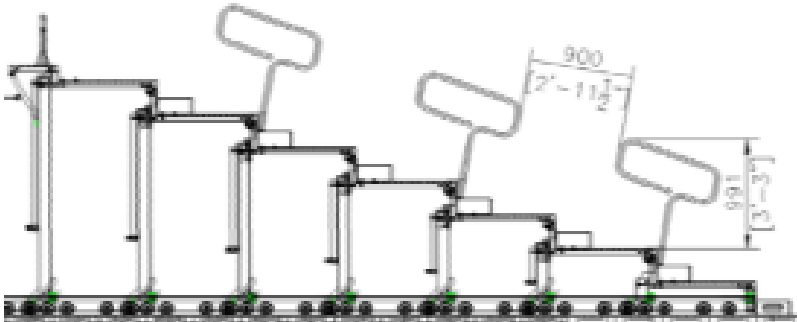
images showing the center handrail at the Telescopic Seating

EAST



North and South railings  
are similar to the West  
railings

WEST





MAURA HEALEY  
GOVERNOR

KIM DRISCOLL  
LIEUTENANT GOVERNOR

YVONNE HAO  
SECRETARY, EXECUTIVE OFFICE  
OF ECONOMIC DEVELOPMENT

**Commonwealth of Massachusetts  
Division of Occupational Licensure  
Office of Public Safety and Inspections  
Architectural Access Board**

1 Federal St., 6th Floor  
Boston, Massachusetts 02118

LAYLA R. D'EMILIA  
UNDERSECRETARY OF CONSUMER  
AFFAIRS AND BUSINESS REGULATION

SARAH R. WILKINSON  
COMMISSIONER, DIVISION OF  
OCCUPATIONAL LICENSURE

**VARIANCE HEARING**

Docket Number **V 25 090**

**RE: White Stadium, 450 Walnut Avenue, Boston**

You are hereby notified that an informal adjudicatory hearing before the Architectural Access Board has been scheduled for you to appear on Monday, **January 26, 2026** at **1:00 PM**. Remote meeting information will be sent out prior to the hearing date.

This hearing is upon an application for variance filed by: Tamara Roy for modification of or substitution of the following Rules and Regulations: 27.4.1. A copy of the request is available for public inspection during regular business hours.

You should be aware that the burden of proof is upon the applicant requesting a variance to prove that compliance is either: 1. technologically infeasible or; 2. the cost of compliance is excessive without substantial benefit to a person with a disability.

This hearing will be conducted in accordance with the procedures set forth in M.G.L., c. 30A, and 801 CMR 1.02, the Informal/Fair Hearings Rules. At the hearing, each party may be represented by counsel, may present evidence and may cross examine opposing witnesses.

**PLEASE NOTE:** Requests for the continuance of a hearing must be received no later than fourteen (14) days prior to the scheduled hearing date. Continuances are granted at the Board's discretion only.

ARCHITECTURAL ACCESS BOARD

Chairperson

Date: September 25, 2025

cc: Local Building Inspector  
Independent Living Center  
Local Disability Commission

---

**RE: Variance Application - 450 Walnut Avenue, Boston, MA 02130**

---

**From** Sippel, Meagan <Meagan.Sippel@stantec.com>

**Date** Thu 9/25/2025 10:53 AM

**To** Joyce, William (DPL) <William.Joyce@mass.gov>; Griffin, Molly (DPL) <Molly.Griffin@mass.gov>; Ronan, Brian (EXT) <brian.ronan@boston.gov>; ada@boston.gov <ada@boston.gov>; Michael Muehe <Mmuehe@bostoncil.org>

**Cc** Roy, Tamara <Tamara.Roy@stantec.com>; John Martino <johnm@ablecompany.us>; Kathryn Denis <kdenis@kmaccess.com>; Veronica Mansilla <vmansilla@kmaccess.com>; Scott Freedman - Legends Global Planning <sfreedman@legends.net>; Lukas Stauffer (lstauffer@legends.net) <lstauffer@legends.net>; Cochran, Kris <kcochran@moodynolan.com>

 1 attachment (343 KB)

White-Stadium-West\_AAB-hearing-request-form-ajudiciary.pdf;

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Please see attached for the AAB Hearing Request Form for the White Stadium (West Grandstand) project.

Thanks,

**Meagan Sippel**

Associate

Direct: (617) 575-3331

Mobile: (617) 842-7289

[meagan.sippel@stantec.com](mailto:meagan.sippel@stantec.com)

 Next OOO: 9/25-10/7

**Stantec Architecture and Engineering P.C.**

40 Water Street, Third Floor, Boston MA 02109-3604, United States



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**From:** Sippel, Meagan

**Sent:** Friday, August 22, 2025 8:08 AM

**AAB 19**



**To:** william.joyce@mass.gov; molly.griffin@mass.gov; brian.ronan@boston.gov; ada@boston.gov; mmuehe@bostoncil.org

**Cc:** Roy, Tamara <Tamara.Roy@stantec.com>; John Martino <johnm@ablecompany.us>; Kathryn Denis <kdenis@kmaccess.com>; Veronica Mansilla <vmansilla@kmaccess.com>; Scott Freedman - Legends Global Planning <sfreedman@legends.net>; Lukas Stauffer (lstauffer@legends.net) <lstauffer@legends.net>; Cochran, Kris <KCochran@moodynolan.com>

**Subject:** RE: Variance Application - 450 Walnut Avenue, Boston, MA 02130

Hello,

Please find the MAAB Variance Narrative - Continued for the White Stadium (West Grandstand) project.

**Attached:**

1. Narrative – Continued
2. Exhibit 1 – Bowl Handrail Diagrams

Thank you and have a wonderful weekend!

Thanks,


**Meagan Sippel**

Associate

Direct: (617) 575-3331

Mobile: (617) 842-7289

[meagan.sippel@stantec.com](mailto:meagan.sippel@stantec.com)

 Next OOO: 9/25-10/7

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---

**From:** Sippel, Meagan <[Meagan.Sippel@stantec.com](mailto:Meagan.Sippel@stantec.com)>

**Sent:** Friday, May 16, 2025 3:29 PM

**To:** [william.joyce@mass.gov](mailto:william.joyce@mass.gov); [molly.griffin@mass.gov](mailto:molly.griffin@mass.gov)

**Cc:** Roy, Tamara <[Tamara.Roy@stantec.com](mailto:Tamara.Roy@stantec.com)>; Josh Safdie <[jsafdie@kmaccess.com](mailto:jsafdie@kmaccess.com)>; John Martino <[johnm@ablecompany.us](mailto:johnm@ablecompany.us)>; [brian.ronan@boston.gov](mailto:brian.ronan@boston.gov); [ada@boston.gov](mailto:ada@boston.gov); [mmuehe@bostoncil.org](mailto:mmuehe@bostoncil.org)

**Subject:** Variance Application - 450 Walnut Avenue, Boston, MA 02130

Hello,

Please find the MAAB Variance Application for the White Stadium (West Grandstand) project.

**Attached:**

1. Variance Application
2. Letter of Authorization
3. Variance Narrative

**AAB 20**

4. Filing fee has been previously submitted

Thank you and have a wonderful weekend!

Thanks,

**Meagan Sippel**

Associate | Architecture

Direct: 617-575-3331

Mobile: 617-842-7289

[meagan.sippel@stantec.com](mailto:meagan.sippel@stantec.com)

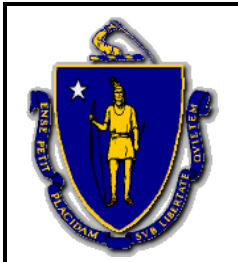
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40 Water Street, 3<sup>rd</sup> Floor

Boston, MA 02109



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**Commonwealth of Massachusetts  
Division of Occupational Licensure  
Office of Public Safety and Inspections  
Architectural Access Board**

1 Federal St., Suite 0600 • Boston • MA • 02110-2012  
V: 617-727-0660 • [www.mass.gov/aab](http://www.mass.gov/aab)

Docket Number

(Office Use Only)

Docket Number: \_\_\_\_\_  
(Staff Use Only)

**REQUEST FOR ADJUDICATORY HEARING**

RE: White Stadium - 450 Walnut Avenue, Boston, MA  
(Name and address of building as appearing on application for variance)

I, Tamara Roy, do hereby request that the Architectural Access Board  
conduct an informal Adjudicatory Hearing in accordance with the provisions of 801 CMR Rule 1.02 et.  
seq. as I am aggrieved by the decision of the Board with respect to Section(s)

27.4.1

of the Rules and Regulations of the Architectural Access Board, 521 CMR.

I understand that I may request such a hearing within **thirty (30) days** of receipt of the Notice of Action.

Date: 9/25/2025

Tamara M. Roy  
Signature

**PLEASE PRINT:**

Tamara Roy

Name

40 Water Street

Address

Boston

City/Town

MA

State

02109

Zip Code

tamara.roy@stantec.com

E-mail

(617) 234-3196

Telephone

**PLEASE NOTE:**

This form must be received by the Board **within thirty (30) days** after receipt of the Notice of Action.



MAURA HEALEY  
GOVERNOR

KIM DRISCOLL  
LIEUTENANT GOVERNOR

YVONNE HAO  
SECRETARY, EXECUTIVE OFFICE  
OF ECONOMIC DEVELOPMENT

Commonwealth of Massachusetts  
Division of Occupational Licensure  
Office of Public Safety and Inspections  
Architectural Access Board

1 Federal St., 6th Floor  
Boston, Massachusetts 02118

LAYLA R. D'EMILIA  
UNDERSECRETARY OF CONSUMER  
AFFAIRS AND BUSINESS REGULATION

SARAH R. WILKINSON  
COMMISSIONER, DIVISION OF  
OCCUPATIONAL LICENSURE

**FIRST AMENDED NOTICE OF ACTION**

Docket Number V 25 090

**RE: White Stadium , 450 Walnut Avenue , Boston**

On August 22, 2025 the Architectural Access Board received an additional submission from Petitioner. The additional documents were reviewed by the Board on September 8, 2025. At that meeting, the Board voted as follows:

<u>#</u>	<u>Section</u>	<u>Result</u>
1	27.4.1	<b>GRANTED</b> as proposed on the condition that: Option 2B is used

**PLEASE NOTE: All documentation (written and visual) verifying that the conditions of the variance have been met must be submitted to the AAB Office as soon as the required work is completed.**

*Any person aggrieved by the above decision may request an adjudicatory hearing before the Board within 30 days of receipt of this decision by filing the attached request for an adjudicatory hearing. If after 30 days, a request for an adjudicatory hearing is not received, the above decision becomes a final decision and the appeal process is through Superior Court.*

Date: September 9, 2025

cc: Local Disability Commission  
Local Building Inspector  
Independent Living Center

*Dawn Guarnello WT*  
Chairperson  
ARCHITECTURAL ACCESS BOARD

**AAB 23**

---

**RE: Variance Application - 450 Walnut Avenue, Boston, MA 02130**

---

**From** Sippel, Meagan <Meagan.Sippel@stantec.com>

**Date** Fri 8/22/2025 8:08 AM

**To** Joyce, William (DPL) <William.Joyce@mass.gov>; Griffin, Molly (DPL) <Molly.Griffin@mass.gov>; Brian Ronan <brian.ronan@boston.gov>; ada@boston.gov <ada@boston.gov>; Michael Muehe <Mmuehe@bostoncil.org>

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 2 attachments (2 MB)

V25-090\_White-Stadium-West\_Additional-Information.pdf; EXHIBIT\_1\_White-Stadium-West\_Bowl-Handrails\_Diagrams.pdf;

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Please find the MAAB Variance Narrative - Continued for the White Stadium (West Grandstand) project.

**Attached:**

1. Narrative – Continued
2. Exhibit 1 – Bowl Handrail Diagrams

Thank you and have a wonderful weekend!

Thanks,

**Meagan Sippel**

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Direct: (617) 575-3331

Mobile: (617) 842-7289

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Next OOO: 9/25-10/7

**Stantec Architecture and Engineering P.C.**

40 Water Street, Third Floor, Boston MA 02109-3604, United States



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**Sent:** Friday, May 16, 2025 3:29 PM  
**To:** william.joyce@mass.gov; molly.griffin@mass.gov  
**Cc:** Roy, Tamara <Tamara.Roy@stantec.com>; Josh Safdie <jsafdie@kmaccess.com>; John Martino <johnm@ablecompany.us>; brian.ronan@boston.gov; ada@boston.gov; mmuehe@bostoncil.org  
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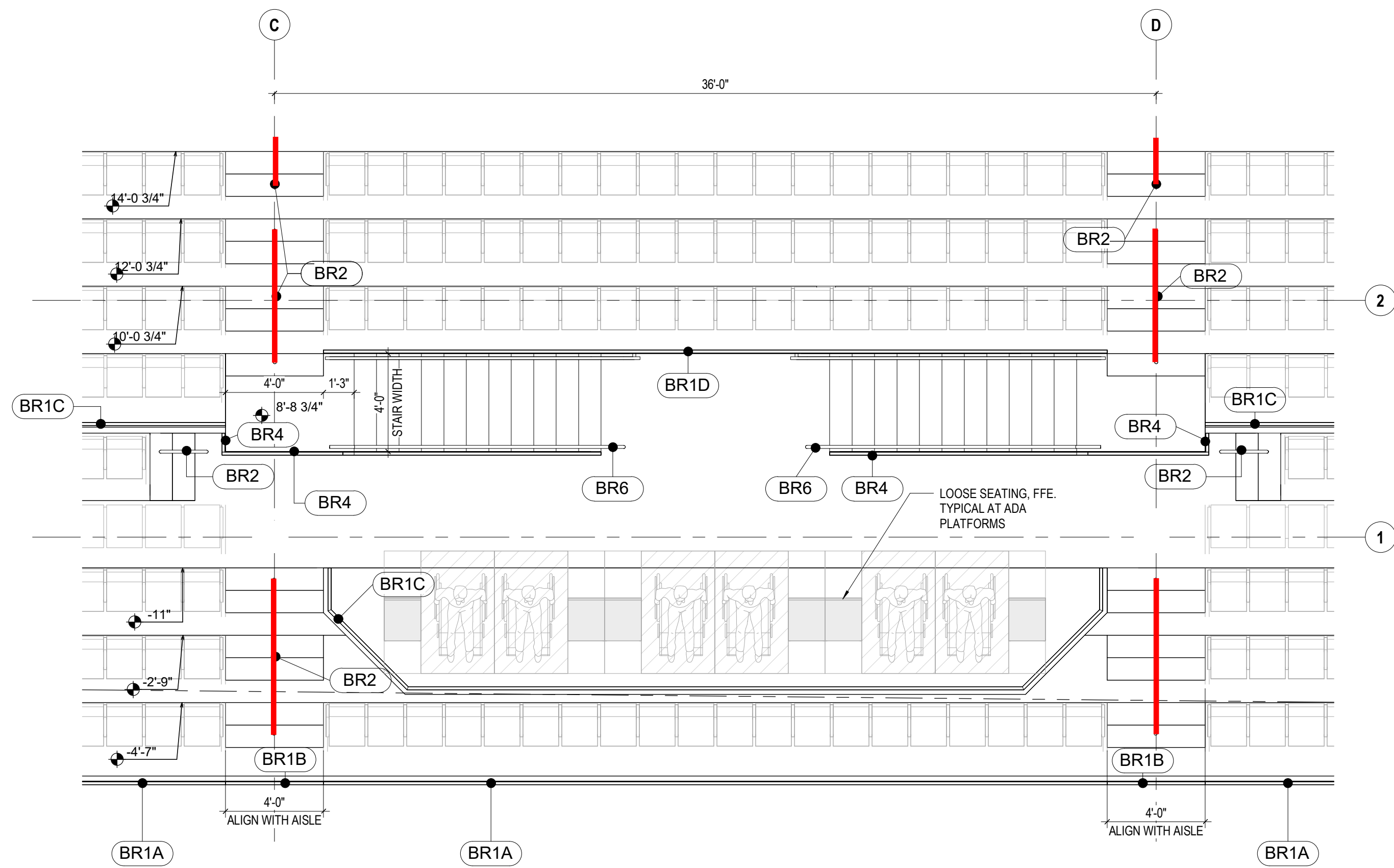
Stantec

40 Water Street, 3<sup>rd</sup> Floor

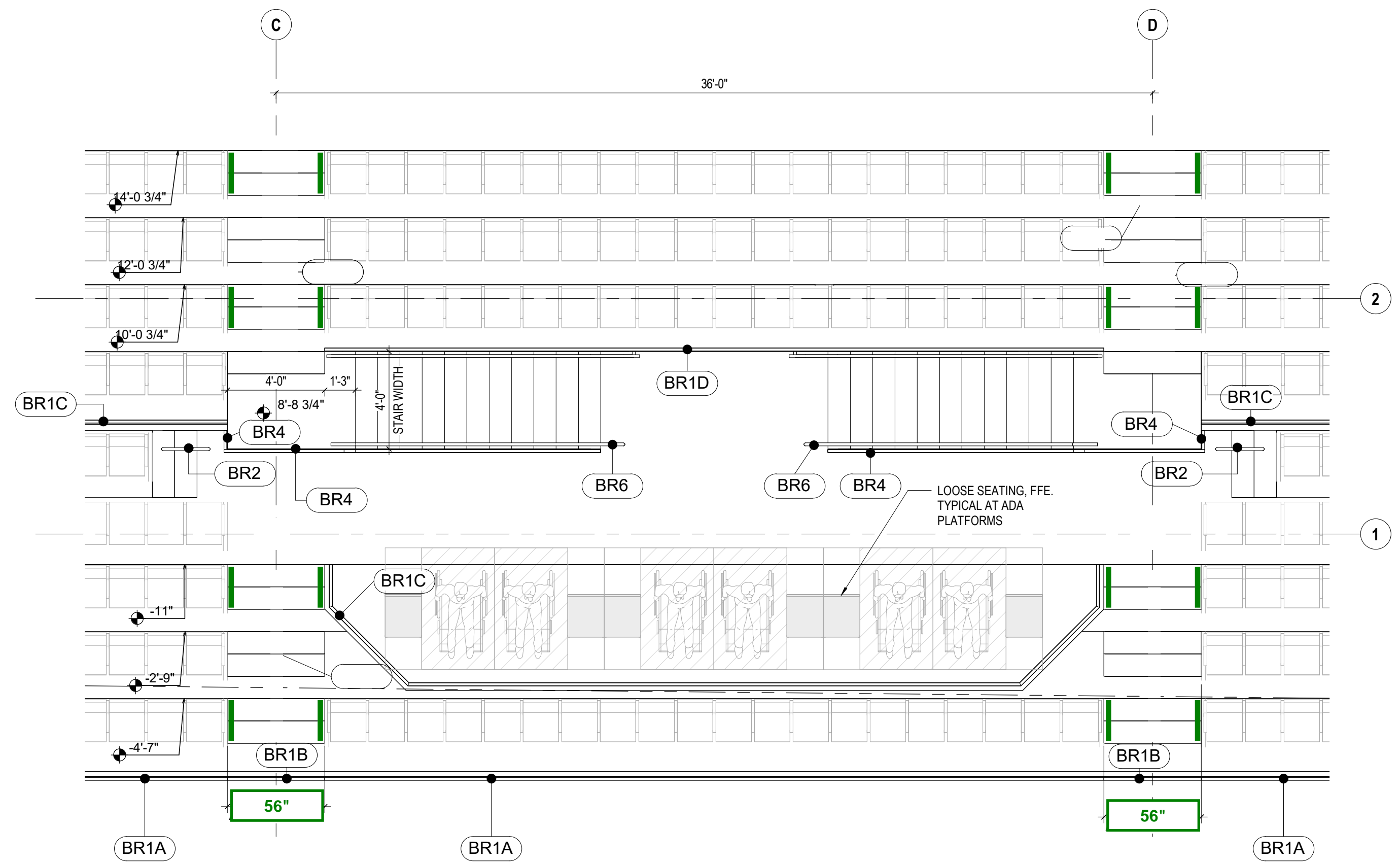
Boston, MA 02109



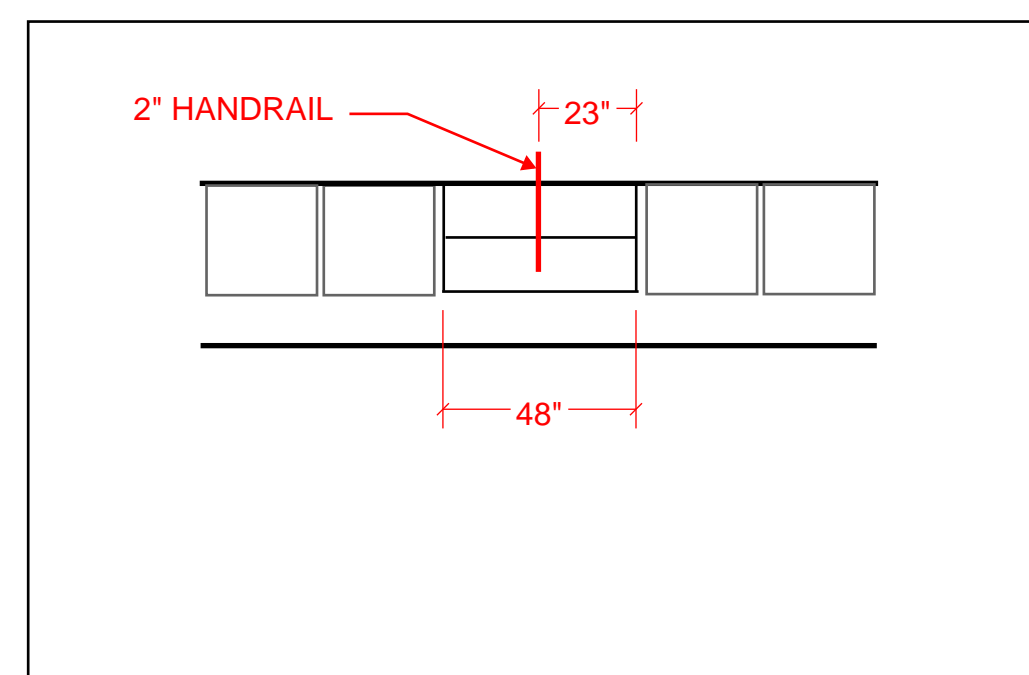
[Stantec Architecture & Interior Design in Boston](#)



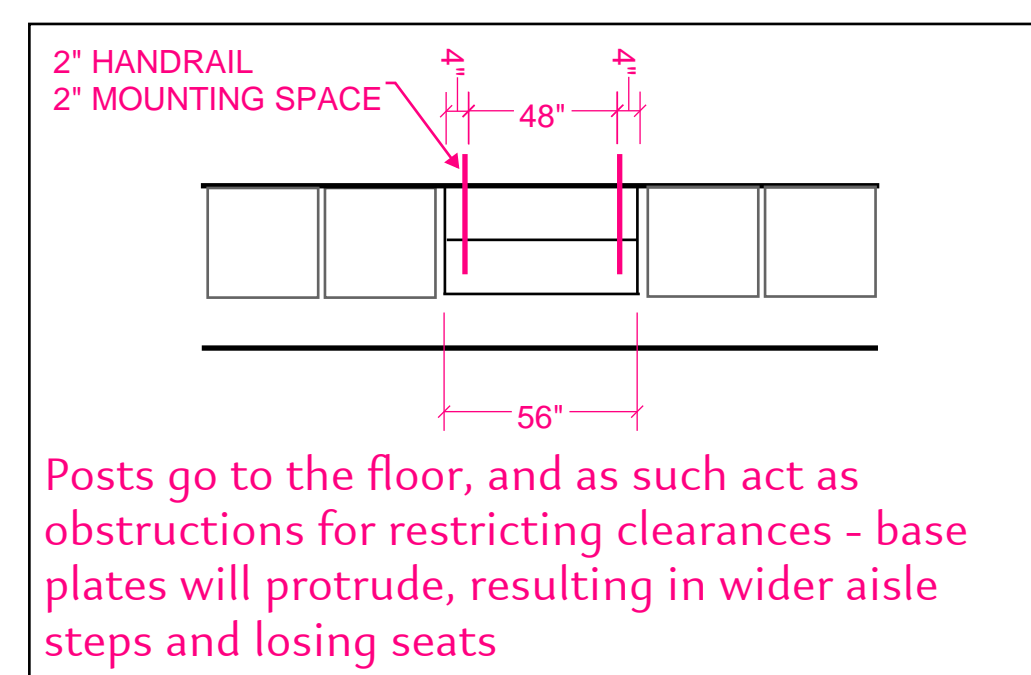
**TYPICAL VOMITORY PLAN OPTION 1 - CENTER HANDRAIL**  
 1/4" = 1'-0"  
 0 4' 6' 8' 10'  
*consider only the red rails*  
*no change to seating count - as designed*



**TYPICAL VOMITORY PLAN OPTION 2A - HANDRAIL BOTH SIDES, EVERY OTHER ROW**  
 1/4" = 1'-0"  
 0 4' 6' 8' 10'  
*consider only the green rails*  
*lose (1) seat per row / per section - total of 100 seats*

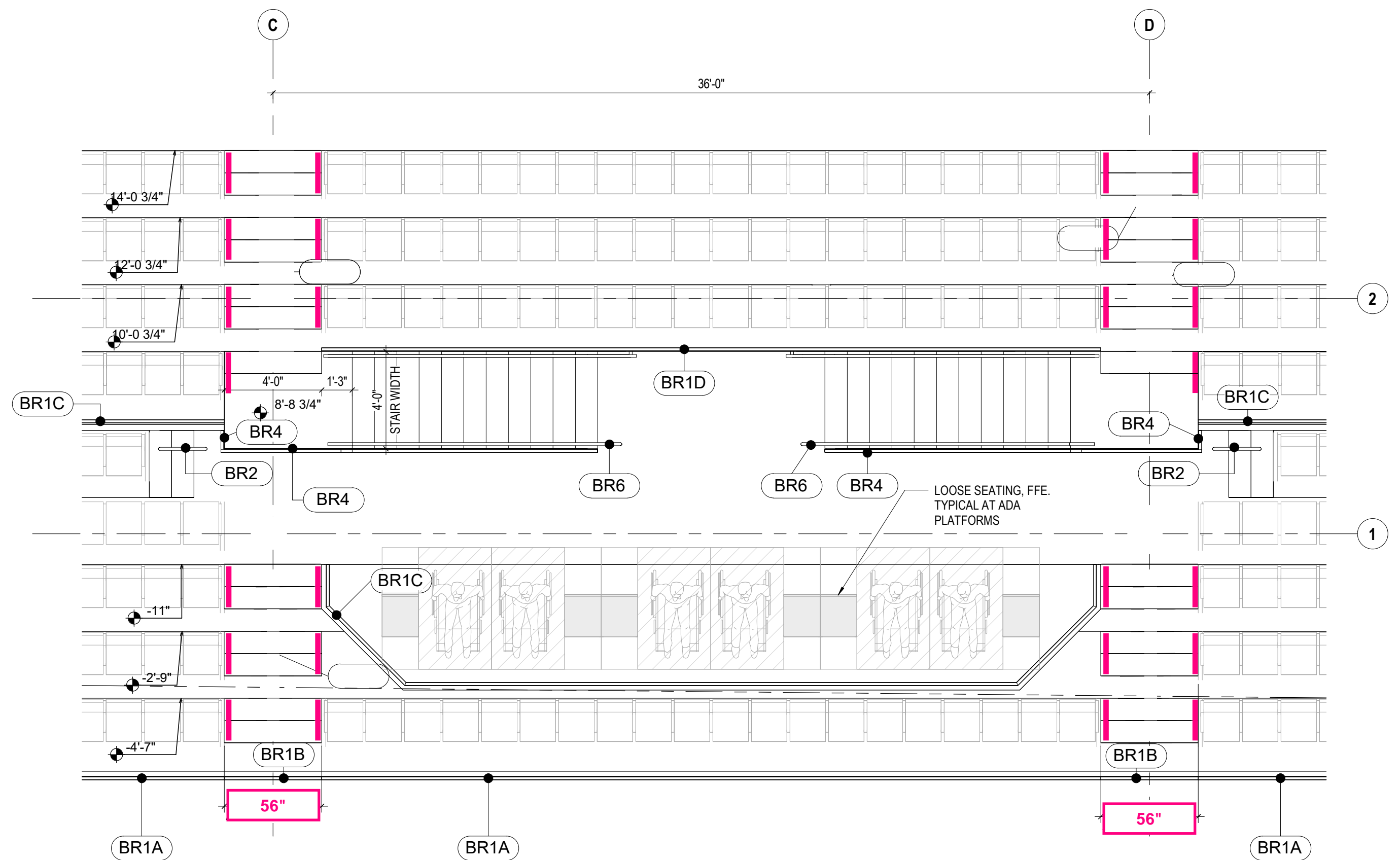


OPTION 1



OPTION 2A & 2B

HANDRAIL DIAGRAMS - NOT TO SCALE



**TYPICAL VOMITORY PLAN OPTION 2B - HANDRAIL BOTH SIDES, EVERY ROW**  
 1/4" = 1'-0"  
 0 4' 6' 8' 10'  
*consider only the pink rails*  
*lose (1) seat per row, per section - total of 100 seats*

## V25-090: White Stadium, 450 Walnut Avenue Boston - Continued

As requested at the June 2, 2025 MAAB meeting, we have studied the feasibility of providing non-continuous handrails on either side of the stairs at the stadium seating and we are submitting the following additional information for the Board's consideration:

### Feasibility Study on Providing Two Side Handrails at the Stadium Seating:

We have conducted further study on providing two handrails at the stadium seating, in lieu of a center rail, as permitted by the 2023 ICC 300 Code. Please see **Exhibit 1** attached. We studied three potential options:

1. Keeping the center handrail as designed and permitted by the current applicable ICC 300 code in MA.
2. Providing handrails on both sides at every row, as permitted by the 2023 ICC 300 Code.
3. Providing handrails on both sides at every other row.

To provide the two non-continuous side handrails at any of the proposed configurations, we discovered the stair aisles are required to be widened from 48" to 56" to provide the required minimum 48" of clearance between the handrails for egress. See 780 CMR Tenth Edition Sections 1030.9.1 and 1014.8 as **Figure 1**. The estimated construction cost of widening the aisles and installing the two side handrails is \$27,000, which is a \$15,000 increase from providing the center handrail. Widening the stairs to 56" will also result in the loss of approximately 102 seats. Each seat brings in approximately \$70 per game. White Stadium hosts approximately 15 games per season. Therefore, providing the two handrails would result in White Stadium losing approximately \$107,100 per year. Please note, this variance is for one phase of the White Stadium project, if the side handrails are required the total seat and revenue loss would be increased when accounting for both phases of the project.

We have also asked the Deputy Building Commissioner of the City of Boston, Marc Joseph, whether complying with the 2023 version of ICC 300 would be an acceptable compliance alternative. Currently, 780 CMR references ICC 300 2017 for bleachers, folding and telescopic seating, and grandstands. Section 409.1 of the 2017 ICC 300 code states that a mid-aisle handrail is required. The 2023 ICC 300 code, which is not yet adopted in MA, permits broken handrails at the sides of stepped aisles instead of a mid-aisle handrail. We are still awaiting information on whether the proposed compliance alternative to meet ICC 300 2023 is acceptable. The timeline for receiving this confirmation is unclear.

### *780 CMR Tenth Edition - Applicable egress stair requirements:*

#### **SECTION 1011 STAIRWAYS**

##### **1011.1 General.** INSIGHTS

Stairways serving occupied portions of a building shall comply with the requirements of Sections 1011.2 through 1011.13. Alternating tread devices shall comply with Section 1011.14. Ship's ladders shall comply with Section 1011.15. Ladders shall comply with Section 1011.16.

**Exception:** Within rooms or spaces used for assembly purposes, stepped aisles shall comply with Section 1030.



#### 1014.8 Projections. INSIGHTS

On ramps and on ramped aisles that are part of an accessible route, the clear width between handrails shall be 36 inches (914 mm) minimum. Projections into the required width of aisles, stairways and ramps at each side shall not exceed 4 1/2 inches (114 mm) at or below the handrail height. Projections into the required width shall not be limited above the minimum headroom height required in Section 1011.3. Projections due to intermediate handrails shall not constitute a reduction in the egress width. Where a pair of intermediate handrails are provided within the stairway width without a walking surface between the pair of intermediate handrails and the distance between the pair of intermediate handrails is greater than 6 inches (152 mm), the available egress width shall be reduced by the distance between the closest edges of each such intermediate pair of handrails that is greater than 6 inches (152 mm).

#### 1030.9.1 Minimum aisle width.

The minimum clear width for aisles shall comply with one of the following:

1. Forty-eight inches (1219 mm) for stepped aisles having seating on both sides.

**Exception:** Thirty-six inches (914 mm) where the stepped aisles serve less than 50 seats.

2. Thirty-six inches (914 mm) for stepped aisles having seating on only one side.

**Exception:** Twenty-three inches (584 mm) between a stepped aisle handrail and seating where a stepped aisle does not serve more than five rows on one side.

3. Twenty-three inches (584 mm) between a stepped aisle handrail or guard and seating where the stepped aisle is subdivided by a mid-aisle handrail.

4. Forty-two inches (1067 mm) for level or ramped aisles having seating on both sides.

**Exceptions:**

1. Thirty-six inches (914 mm) where the aisle serves less than 50 seats.

2. Thirty inches (762 mm) where the aisle serves less than 15 seats and does not serve as part of an accessible route.

5. Thirty-six inches (914 mm) for level or ramped aisles having seating on only one side.

**Exception:** Thirty inches (762 mm) where the aisle serves fewer than 15 seats and does not serve as part of an accessible route.

*Figure 1*

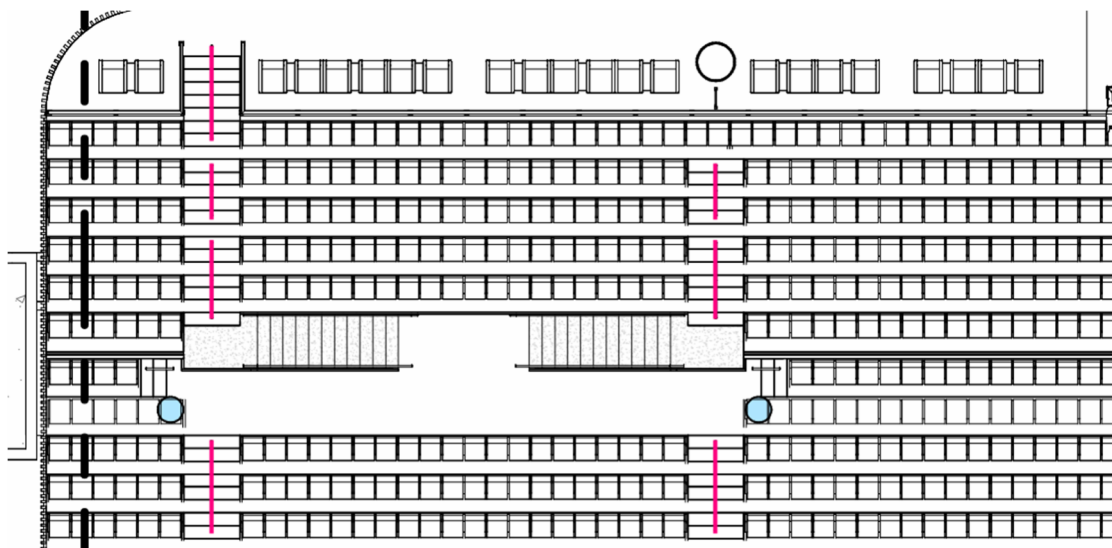
#### Compliance Alternative:

We are proposing keeping the center handrail, as permitted by the current version of ICC 300 in MA. As a compliance alternative, and in an effort to be inclusive and welcoming to persons with disabilities, we are proposing the following mitigation measures:

- Providing an usher to escort guests to and from their seats during games
- Subject to availability, ensuring that guests can purchase seats at their desired price level, even if the seats themselves are in a premium section
- Ensuring guests are aware of staff availability for assistance to discuss routes of travel and most accessible seats within sections over the phone; we will give those guests a priority when buying season tickets
- Posting the following information on the accessibility page of the website to provide patrons with accurate information regarding the center handrail so they can make an informed decision regarding seat selection:

*White Stadium has center handrails at the stairs leading to stepped seating in the Main and Upper Concourse Levels. Below is a sample of the location of these center handrails on the Main and Concourse Levels so guests can make an informed decision regarding seat selection.*

*Figure 1\*: Example clip identifying center handrails:*



\*Note: the website is still in development, this clip is intended to provide a graphic sample of the information to be provided.

#### Additional Accessibility Information at White Stadium:

The design of George White Stadium has placed safety, accessibility, and functionality at the utmost importance. Patrons of all abilities will be accommodated at every seat offering, ensuring easy and equitable access to all.

The Stadium's Pitch Level houses both premium ticket holders, as well as the home and visiting team spaces. Spectator restrooms on all levels offer toilet and accessible stall capacity well above code minimum, while emphasizing individual privacy with gap free partitions and occupancy indicators. Single user restrooms offer not only ample space and privacy but also feature distributed adult and baby changing stations to support a range of families and mobility concerns. Additionally, there will be access to two single-user restrooms and a drinking fountain from outside the stadium, on the Franklin Park side, during non-game times. Spectator seats on the pitch level offer the best and most exciting views in the stadium. There are 38 priority viewing wheelchair seats plus non-fixed companion chairs to accommodate different sized groups of patrons. These seats are located at each section of seating across the entire south, west, and north endlines, providing complete horizontal distribution of accessible pitch seating. Team locker rooms are designed with a range of accommodating features, including accessible training spaces, exam rooms, hydrotherapy tubs, male/female coaches lockers rooms, player locker rooms, and special use U18 player locker rooms, for underage players.

The Suite Level is accessed by three elevators by those holding premium tickets, giving patrons accessible approach to two terrace clubs, suite lounges, food buffets, and bars. In addition to men's and women's restrooms, two single-user family restrooms are provided on this level. Each suite is fully accessible, with aisle seats with movable arm rests and removable drink rails to accommodate wheelchairs. The suites offer a furniture side table solution for when seats and drink rail are removed, ensuring an equal level of added amenity for patrons of all ability levels.

Each of these seats have equal horizontal distribution along the sideline, and easiest path of access.

At the Main Concourse Level, men's, women's, gender-neutral, and single-user family restrooms are equipped with distributed baby and adult changing tables. This allows general admission ticket holders and families multiple accessible options. Special accommodation can be found at the guest services suite on the main concourse. This suite includes an enhanced mother's room, equipped with three comfortable privacy stalls with cleanup station, and a sensory room for neurodiverse spectators. In addition to a guest service suite, a first aid room is available on this level. At this level, there are 24 priority viewing wheelchair seats plus non-fixed companion chairs. These are located at the center of the vomitories to provide the most direct and easiest path of access to concession, restrooms, and guest service amenities. There are designated aisle seats with movable arm rests, located at the cross-aisle row, with horizontal distribution along the entire sideline.

The upper concourse houses two fully accessible single-user restrooms which can be entered from the loge seating level for ease of access. The loge seating on this level includes 22 wheelchair spaces, distributed along the sideline offering a variety of views.

### Summary

It is our opinion that, given the factors outlined above, it is *impracticable* to provide non-continuous side handrails at both sides of the stairs as it will result in an excessive cost without substantial benefit to persons with disabilities. We are still awaiting an interpretation from the Deputy Building Commissioner on whether non-continuous side handrails at both sides of the stairs is acceptable as a compliance alternative to meet the current ICC 300 code. The timeline for this decision is unclear and, after further review, we believe the construction, seating loss, and total revenue costs of providing the side handrails constitute a significant cost without substantial benefit to persons with disabilities. Providing non-continuous side handrails at both sides of the stairs will result in a construction cost of \$27,000, a seat loss of approximately 102 seats at this phase of the stadium project, and a potential yearly revenue loss of approximately \$107,100. The team is prioritizing substantial accessibility upgrades to White Stadium and will provide information on the center handrails on their website. We therefore respectfully ask that the MAAB consider this additional information in their decision regarding V25-090.



MAURA HEALEY  
GOVERNOR

KIM DRISCOLL  
LIEUTENANT GOVERNOR

YVONNE HAO  
SECRETARY, EXECUTIVE OFFICE  
OF ECONOMIC DEVELOPMENT

Commonwealth of Massachusetts  
Division of Occupational Licensure  
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AFFAIRS AND BUSINESS REGULATION

SARAH R. WILKINSON  
COMMISSIONER, DIVISION OF  
OCCUPATIONAL LICENSURE

**NOTICE OF ACTION**

Docket Number **V 25 090**

**RE: White Stadium , 450 Walnut Avenue , Boston**

On May 16, 2025 the Architectural Access Board received an application submitted by Tamara Roy .  
This application and all attached documentation were reviewed by the Board on June 2, 2025 .  
At that meeting, the Board voted as follows:

<u>#</u>	<u>Section</u>	<u>Result</u>
1	27.4.1	<b>CONTINUED</b> to request Petitioner provide the Board with: a feasibility study on non-continuous handrails on either side, and confirmation from the responsible local building official that this would not be an acceptable compliance alternative.

**PLEASE NOTE: All documentation (written and visual) verifying that the conditions of the variance have been met must be submitted to the AAB Office as soon as the required work is completed.**

*Any person aggrieved by the above decision may request an adjudicatory hearing before the Board within 30 days of receipt of this decision by filing the attached request for an adjudicatory hearing. If after 30 days, a request for an adjudicatory hearing is not received, the above decision becomes a final decision and the appeal process is through Superior Court.*

Date: June 6, 2025

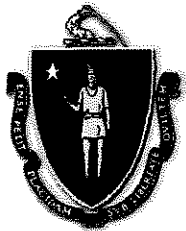
cc: Local Disability Commission  
Local Building Inspector  
Independent Living Center

*Dawn Guarnello* WT

Chairperson  
ARCHITECTURAL ACCESS BOARD

**AAB 31**

703103



**Commonwealth of Massachusetts  
Division of Occupational Licensure  
Office of Public Safety and Inspections  
Architectural Access Board**

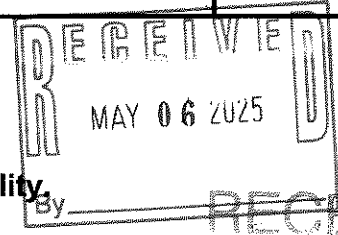
1 Federal St., Suite 0600 • Boston • MA • 02110-2012  
V: 617-727-0660 • [www.mass.gov/aab](http://www.mass.gov/aab)

Docket Number

**V25-090**

(Office Use Only)

r-0302538

**APPLICATION FOR VARIANCE**

RECEIVED

MAY 21 2025

EDP

**INSTRUCTIONS:**

- 1) Answer all questions on this application to the best of your ability.
  - a. Information on the Variance Process can be found at:  
<https://www.mass.gov/guides/applying-for-an-aab-variance>.
- 2) Attach whatever documents you feel are necessary to meet the standard of impracticability laid out in 521 CMR 4.1. You must show that either:
  - a. Compliance is technologically infeasible, or
  - b. Compliance would result in an excessive and unreasonable cost without any substantial benefit for persons with disabilities.
- 3) Sign the certification on Page 8.
- 4) If the applicant is not the owner of the building or his or her agent, include a signed letter from the owner granting permission for you to apply for variance.
- 5) Serve copies of the completed application and all attachments via electronic or physical delivery based on the recipient's preference to:
  - a. Local Building Department,
  - b. Local Commission on Disability (if applicable in the town where the project is located) (A list of all active Disability Commissions can be found at: <https://www.mass.gov/commissions-on-disability>), and
  - c. The Independent Living Center (ILC) for your area.  
(Your ILC can be found at: <http://www.masilc.org/findacenter>.)
- 6) Complete the Service Notice included with the Application and sign it.
- 7) Deliver the completed Application and all attachments to the Board via electronic or physical delivery:
  - a. Electronic:
    - i. Applications should be sent via email to [william.joyce@mass.gov](mailto:william.joyce@mass.gov) & [molly.griffin@mass.gov](mailto:molly.griffin@mass.gov).
    - ii. The email submission must have the subject line: Variance Application - <Address>, <City>
    - iii. The application and all attachments must be in .pdf format
    - iv. The application and all attachments should be included in a single email, except where that email would exceed 15 megabytes in size.
    - v. Please submit the \$50 filing fee via check or money order via mail to the mailing address listed above with either a cover letter or, "Variance - <Address>, <City>" in the memo line.
  - b. Physical
    - i. Applications should be sent to the mailing address listed above and must include:
      1. The completed application and all attachments.
      2. A copy of the application and all attachments on a CD/DVD (Thumb Drives will not be accepted),

3. The completed and signed Service Notice.
  4. A check or money order in the amount of \$50 dollars, made out to the Commonwealth of Massachusetts.
- ii. Please ensure that all documents included are no larger than 11" x 17".
  - iii. Incomplete applications will be returned via regular mail to the applicant with an explanation as why it was unable to be docketed.

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In accordance with M.G.L., c.22, § 13A, I hereby apply for modification of or substitution for the rules and regulations of the Architectural Access Board as they apply to the building/facility described below on the grounds that literal compliance with the Board's regulations is impracticable in my case.

1. State the name and address of the building/facility:

**White Stadium**  
450 Walnut Avenue  
Boston, MA 02130

2. State the name and address of the **owner** of the building/facility:

E-mail: \_\_\_\_\_

Telephone: \_\_\_\_\_

3. Describe the facility (i.e. number of floors, type of functions, use, etc.):

The White Stadium is a sports venue facility located in the Playstead section of Franklin Park in Boston. Constructed between 1947 and 1949, the stadium was primarily used by the Boston Public Schools athletics program for sporting events, including track and field, soccer, and football.

The new stadium, on the west side only, has 4 levels with a seating capacity of ~7,000, and associated facility restrooms, locker rooms, and additional support program.

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**Variance Application - 450 Walnut Avenue, Boston, MA 02130**

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**From** Sippel, Meagan <Meagan.Sippel@stantec.com>

**Date** Fri 5/16/2025 3:35 PM

**To** Joyce, William (DPL) <William.Joyce@mass.gov>; Griffin, Molly (DPL) <Molly.Griffin@mass.gov>

**Cc** Roy, Tamara <Tamara.Roy@stantec.com>; Josh Safdie <jsafdie@kmaccess.com>; John Martino <johnm@ablecompany.us>; Brian Ronan <brian.ronan@boston.gov>; ada@boston.gov <ada@boston.gov>; Michael Muehe <Mmuehe@bostoncil.org>

 3 attachments (1 MB)

Form-AAB-Variance-Application\_White Stadium.pdf; 049460\_5-15-2025\_10-04-22.pdf; Variance Narrative\_White Stadium\_05.16.2025.pdf;

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Please find the MAAB Variance Application for the White Stadium (West Grandstand) project.

**Attached:**

1. Variance Application
2. Letter of Authorization
3. Variance Narrative
4. Filing fee has been previously submitted

Thank you and have a wonderful weekend!

Thanks,

**Meagan Sippel**

Associate | Architecture

Direct: 617-575-3331

Mobile: 617-842-7289

[meagan.sippel@stantec.com](mailto:meagan.sippel@stantec.com)

Stantec

40 Water Street, 3<sup>rd</sup> Floor

Boston, MA 02109



Stantec Architecture & Interior Design in Boston



## Introduction

In April of 2023, the City of Boston released a request for proposals to lease a portion of White Stadium in a public-private partnership, which the Boston Unity Soccer Partners (BUSP) was awarded, to help renovate, rebuild, and reimagine White Stadium in Franklin Park. The plan for the revitalization of the site includes renovation and additions to the existing West Grandstand. The historic, curved concrete wall (the 'clamshell' wall) at the exterior of the existing seating will be preserved while the existing bleacher seats and stadium foundation will be demolished, as well as the existing floors and columns. The Project will replace the current 5,000 bleacher seats with approximately 5,000 bucket seats within the West Grandstand, with additional team and fan programs. A roof canopy will provide weather protection to the West Grandstand seating.

The renovations to the West Grandstand are expected to exceed 30% of the *full and fair cash value* of the building, which will trigger the requirement for full compliance with 521 CMR in those buildings. While the Project will significantly improve the accessibility of the site and the stadium, Stantec is requesting one variance based on impracticability. The details of this variance request are laid out below.

**Request: Variance not to provide continuous handrails on both sides of the stairs in spectator seating areas [521 CMR 27.4.1]**

### Code References:

521 CMR 27.4.1 states in part: "*Stairways shall have continuous handrails on both sides of all stairs.*"

### Relevant Information:

The 5,000 bucket seats in the West Grandstand will be distributed among three levels from bottom to top: Suite Level, Main Concourse Level, and Upper Concourse Level. Approximately 2,700 of these will be located on the Main and Upper Concourse Levels, which include double-loaded stairs that lead to stepped seating on either side (see Figures 1 to 3).

The requirement for handrails at both sides of the stairs makes it impossible for spectators to access the seating aisle because there is not a landing at each aisle. Thus, full compliance with the requirements of 521 CMR 27.4.1 is *impracticable* due to technological unfeasibility.

The design team instead proposes to install a single central handrail at the mid-point of the width of the treads at all stairs. The handrail is largely continuous, interrupted approximately every 5' at each landing to preserve sightlines from the seats and to allow for crossing spectator traffic. This central handrail is also a specific requirement of the 2022 International Building Code, which the Commonwealth of Massachusetts has adopted as its building code (with amendments) as of October 2024.

The design of the handrail, in addition to being required by 780 CMR, was guided by several factors that would provide the greatest benefit for persons with disabilities:

- A largely continuous, single, central handrail allows spectators who favor one side or arm to use it to ascend and descend, regardless of their preferred arm - a feature comparable to stairs with handrails on both sides.



- The design team considered individual handrails at both sides, broken at each seating aisle, but felt that a largely continuous, single, central handrail - particularly in a location where individuals may experience dizziness or discomfort due to the height and steepness of the raked seating - would be preferable. Additionally, the team worried about the possibility of conflict between spectators that would arise from people using individual handrails in such close proximity to the heads of seated spectators.
- The required stair widths, and patterns of use of the handrails in a sports venue, would not allow a user to grab both handrails simultaneously, even if they were both installed on each side of the stair - they would ultimately use only one stair handrail regardless.

## Summary

It is technologically unfeasible to provide continuous handrails at both sides of the stairs while still providing access to the seating rows the stairs serve. The design team feels a center handrail provides the greatest degree of similarity to the design requirements of 521 CMR while still allowing access to the seating aisles and maximizing spectator comfort. And a center handrail is a requirement of 780 CMR for stadium seating regardless. Given these facts, Stantec requests a variance from the requirements of 521 CMR 27.4.1 on the basis of *impracticability*.

## Figures

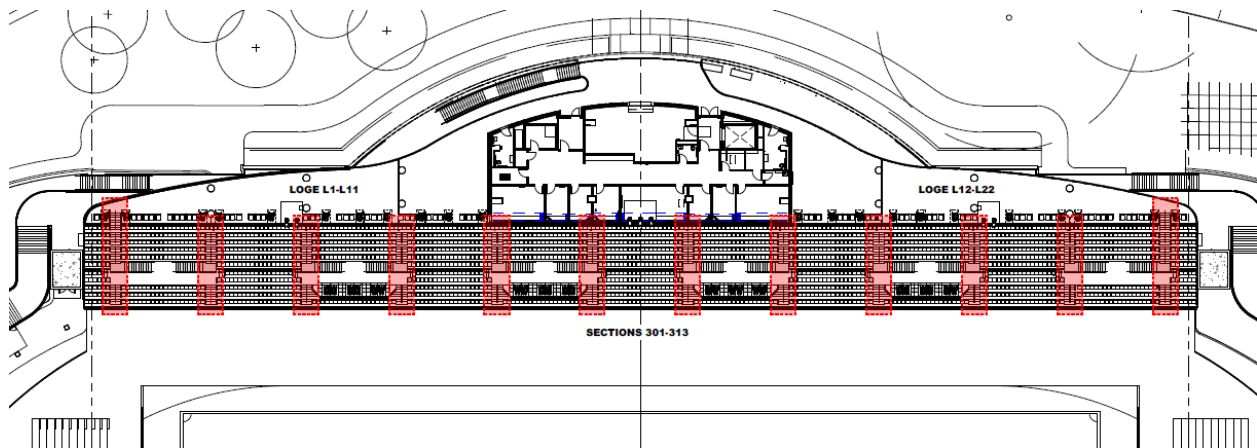


Figure 1. Locations of the stairs with the proposed single central handrail on the Main and Upper Concourse Levels.

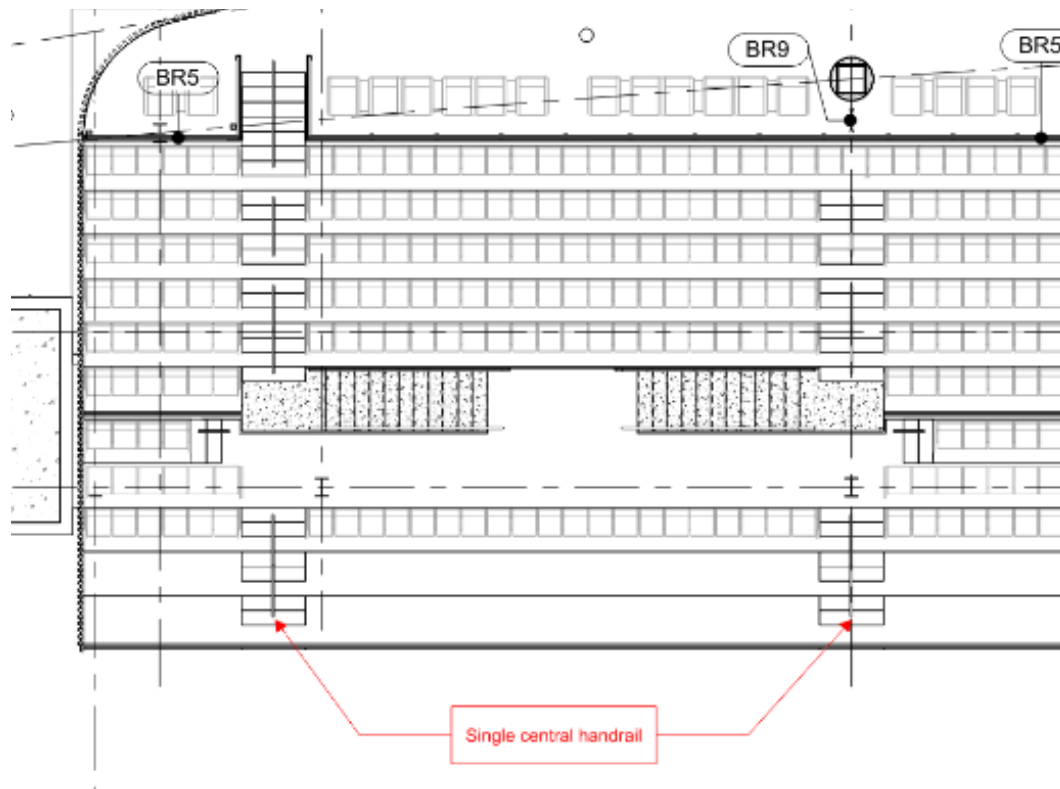


Figure 2. Detail plan of a portion of the Main and Upper Concourse Levels showing the proposed single handrail.

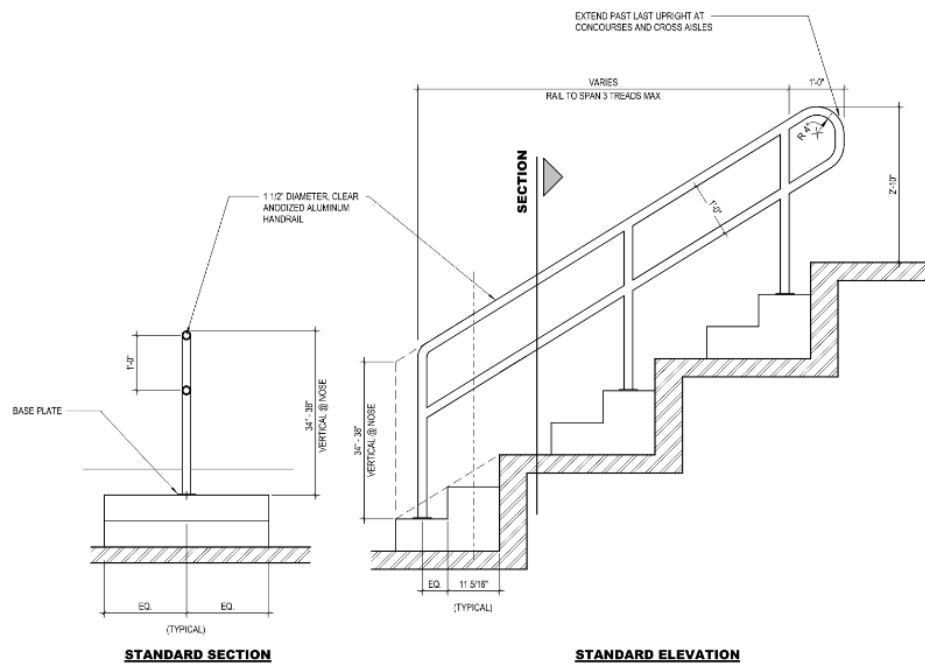
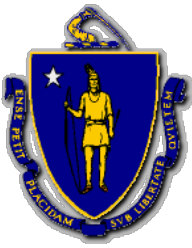


Figure 3. Elevation of the proposed single handrail at the Main and Upper Concourse Levels.



**Commonwealth of Massachusetts  
Division of Occupational Licensure  
Office of Public Safety and Inspections  
Architectural Access Board**

1 Federal St., Suite 0600 • Boston • MA • 02110-2012  
V: 617-727-0660 • [www.mass.gov/aab](http://www.mass.gov/aab)

Docket Number

(Office Use Only)

**APPLICATION FOR VARIANCE**

**INSTRUCTIONS:**

- 1) Answer all questions on this application to the best of your ability.
  - a. Information on the Variance Process can be found at:  
<https://www.mass.gov/guides/applying-for-an-aab-variance>.
- 2) Attach whatever documents you feel are necessary to meet the standard of impracticability laid out in 521 CMR 4.1. You must show that either:
  - a. Compliance is technologically infeasible, or
  - b. Compliance would result in an excessive and unreasonable cost without any substantial benefit for persons with disabilities.
- 3) Sign the certification on Page 8.
- 4) If the applicant is not the owner of the building or his or her agent, include a signed letter from the owner granting permission for you to apply for variance.
- 5) Serve copies of the completed application and all attachments via electronic or physical delivery based on the recipient's preference to:
  - a. Local Building Department,
  - b. Local Commission on Disability (if applicable in the town where the project is located) (A list of all active Disability Commissions can be found at: <https://www.mass.gov/commissions-on-disability>), and
  - c. The Independent Living Center (ILC) for your area.  
(Your ILC can be found at: <http://www.masilc.org/findacenter>.)
- 6) Complete the Service Notice included with the Application and sign it.
- 7) Deliver the completed Application and all attachments to the Board via electronic or physical delivery:
  - a. Electronic:
    - i. Applications should be sent via email to [william.joyce@mass.gov](mailto:william.joyce@mass.gov) & [molly.griffin@mass.gov](mailto:molly.griffin@mass.gov).
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    - iv. The application and all attachments should be included in a single email, except where that email would exceed 15 megabytes in size.
    - v. Please submit the \$50 filing fee via check or money order via mail to the mailing address listed above with either a cover letter or, "Variance - <Address>, <City>" in the memo line.
  - b. Physical
    - i. Applications should be sent to the mailing address listed above and must include:
      1. The completed application and all attachments.
      2. A copy of the application and all attachments on a CD/DVD (Thumb Drives will not be accepted),

3. The completed and signed Service Notice.
  4. A check or money order in the amount of \$50 dollars, made out to the Commonwealth of Massachusetts.
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In accordance with M.G.L., c.22, § 13A, I hereby apply for modification of or substitution for the rules and regulations of the Architectural Access Board as they apply to the building/facility described below on the grounds that literal compliance with the Board's regulations is impracticable in my case.

1. State the name and address of the building/facility:

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2. State the name and address of the owner of the building/facility:

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E-mail: 

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Telephone: 

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3. Describe the facility (i.e. number of floors, type of functions, use, etc.):

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4. Total square footage of the building/facility: \_\_\_\_\_

Per floor: \_\_\_\_\_

a. Total square footage of tenant space (if applicable): \_\_\_\_\_

5. What was the original year of construction for the building/facility: \_\_\_\_\_?

6. Check the nature of the work performed or to be performed:

☐

New Construction

☐

Addition

☐

Reconstruction/Remodeling/Alteration

☐

Change of Use

7. Briefly describe the extent and nature of the work performed or to be performed (use additional sheets if necessary):

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8. Is the building or facility historically significant? ☐ Yes ☐ No

a. If yes, check one of the following and indicate date of listing:

☐

National Historic Landmark

\_\_\_\_\_

☐

Listed individually on the National Register of Historic Places

\_\_\_\_\_

☐

Located in a Registered Historic District

\_\_\_\_\_

☐

Listed in the State Register of Historic Places

\_\_\_\_\_

☐

Eligible for listing

\_\_\_\_\_

(In which registry?)

b. If you checked any of the above **and** your variance request is primarily based upon the historical significance of the building, you *must* complete the ADA Consultation Process of the [Massachusetts Historical Commission](#), located at 220 Morrissey Boulevard, Boston, MA 02125.

9. Which section(s) of the Board's Jurisdiction (*see Section 3 of the Board's Regulations*) has been triggered?

2.6 ☐ 3.2 ☐ 3.3.1(a) ☐ 3.3.1(b) ☐ 3.3.2 ☐ 3.3.4 ☐ 3.4 ☐

10. List **all** building permits that have been applied for within the past 36 months, include the issue date and the listed value of the work performed:

<u>Permit #</u>	<u>Date of Issuance</u>	<u>Value of Work</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

(Use additional sheets if necessary.)

11. List the anticipated construction cost for any work not yet permitted or for any relevant work which does not require a permit:

\_\_\_\_\_

12. Has a certificate of occupancy been issued for the facility? ☐ Yes ☐ No

If yes, state the date it was issued: \_\_\_\_\_

13. To the best of your knowledge, has a complaint ever been filed with the AAB on this building or facility relative to accessibility? ☐ Yes ☐ No

a. If so, list the AAB docket number of the complaint \_\_\_\_\_

14. For existing buildings or facilities, state the actual assessed valuation of the **BUILDING/IMPROVEMENTS ONLY**, as recorded in the **Assessor's Office** of the municipality in which the building or facility is located: \_\_\_\_\_

Is the assessment at 100%? ☐ Yes ☐ No

If not, what is the town's current assessment ratio? \_\_\_\_\_

15. State the phase of design or construction of the facility as of the date of this application:

\_\_\_\_\_

**Please list specific technical sections, not 521 CMR 3.****Request #1**

Section(s) for which you are seeking relief: \_\_\_\_\_

Are you seeking temporary relief: ☐ Yes ☐ No

If yes, what date do you propose to be in compliance by: \_\_\_\_\_?

Please describe in detail why compliance with the Board's regulations are impracticable (as defined in 521 CMR 5) for the subject of this request, and attach whatever documents are relevant to support your argument that compliance is impracticable (attach additional pages if necessary, please identify which request each attachment is in support of):

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Types of Attachments for this Request:

☐ Floor/Site Plans, ☐ Cost Estimates,  
☐ Photographs, ☐ Test Drawings,  
☐ Other(s): \_\_\_\_\_
**Request #2**

Section(s) for which you are seeking relief: \_\_\_\_\_

Are you seeking temporary relief: ☐ Yes ☐ No

If yes, what date do you propose to be in compliance by: \_\_\_\_\_?

Please describe in detail why compliance with the Board's regulations are impracticable (as defined in 521 CMR 5) for the subject of this request, and attach whatever documents are relevant to support your argument that compliance is impracticable (attach additional pages if necessary, please identify which request each attachment is in support of):

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Types of Attachments for this Request:

☐ Floor/Site Plans, ☐ Cost Estimates,  
☐ Photographs, ☐ Test Drawings,  
☐ Other(s): \_\_\_\_\_

Request #3

Section(s) for which you are seeking relief: \_\_\_\_\_

Are you seeking temporary relief: ☐ Yes ☐ No

If yes, what date do you propose to be in compliance by: \_\_\_\_\_?

Please describe in detail why compliance with the Board's regulations are impracticable (as defined in 521 CMR 5) for the subject of this request, and attach whatever documents are relevant to support your argument that compliance is impracticable (attach additional pages if necessary, please identify which request each attachment is in support of):

Types of Attachments for this Request:

☐ Floor/Site Plans, ☐ Cost Estimates,  
☐ Photographs, ☐ Test Drawings,  
☐ Other(s): \_\_\_\_\_

Request #4

Section(s) for which you are seeking relief: \_\_\_\_\_

Are you seeking temporary relief: ☐ Yes ☐ No

If yes, what date do you propose to be in compliance by: \_\_\_\_\_?

Please describe in detail why compliance with the Board's regulations are impracticable (as defined in 521 CMR 5) for the subject of this request, and attach whatever documents are relevant to support your argument that compliance is impracticable (attach additional pages if necessary, please identify which request each attachment is in support of):

Types of Attachments for this Request:

☐ Floor/Site Plans, ☐ Cost Estimates,  
☐ Photographs, ☐ Test Drawings,  
☐ Other(s): \_\_\_\_\_



If you require more than 4 requests, please use the *Additional Request Sheet* and complete the *Large Variance Tally Sheet*, both of which are available on the “Forms and Applications” page of the Board’s website (<http://www.mass.gov/aab>).

17. State the name and address of the architectural or engineering firm, including the name of the individual architect or engineer responsible for preparing drawings of the facility:

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E-mail: \_\_\_\_\_

Telephone: \_\_\_\_\_

18. State the name and address of the building inspector responsible for overseeing this project:

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E-mail: \_\_\_\_\_

Telephone: \_\_\_\_\_

**I DECLARE UNDER THE PENALTY OF PERJURY THAT THE INFORMATION PROVIDED IN THIS APPLICATION AND SUPPORTING DOCUMENTATION IS TRUE AND CORRECT**

Date: \_\_\_\_\_

**Signature of owner or authorized agent** *(required)*

**PLEASE PRINT:**

\_\_\_\_\_  
Name

\_\_\_\_\_  
Organization (If Applicable)

\_\_\_\_\_  
Address

\_\_\_\_\_  
Address 2 (optional)

\_\_\_\_\_  
City/Town

State

Zip Code

\_\_\_\_\_  
E-mail

\_\_\_\_\_  
Telephone

# SERVICE NOTICE

I, \_\_\_\_\_, as \_\_\_\_\_  
(Name) (Relationship to the applicant)

HEREBY CERTIFY UNDER THE PAINS AND PENALTIES OF PERJURY THAT I SERVED OR CAUSED TO BE SERVED, A COPY OF THIS VARIANCE APPLICATION ON THE FOLLOWING PERSON(S) IN THE FOLLOWING MANNER:

<u>NAME AND ADDRESS OF PERSON OR AGENCY SERVED</u>		<u>METHOD OF SERVICE</u>	<u>DATE OF SERVICE</u>
<b>1</b> Building Department			
<b>2</b> Local Commission on Disability (If Applicable)			
<b>3</b> Independent Living Center			

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date



Superintendent  
Mary Skipper



Mayor Michelle Wu

May 9th, 2025

Massachusetts Architectural Access Board  
1000 Washington St, Ste. 710  
Boston, MA 02118

**RE:** MAAB Variance for Address: 450 Walnut Ave, Boston MA 02130

To Whom It May Concern,

I am writing as an authorized representative on behalf of Boston Public Schools as the owner and one responsible for the care and custody of The George Robert White Stadium Parcel, located at 450 Walnut Avenue, Boston, MA 02130. Please accept this letter as express written approval for Stantec to apply as Agent of Owner for this MAAB variance related to the West Grandstand of the White Stadium project.

Dr. Samuel DePina

A handwritten signature in black ink that reads "Samuel DePina". The signature is written in a cursive, flowing style.

Deputy Superintendent of Operations, Boston Public Schools