



**#178-20**

May 7, 2020

Members of the City Council  
Members of the Planning & Development Board  
City of Newton, Massachusetts

Dear City Councilors and Board Members,

I am writing to you in my capacity as president of the Bullough's Pond Association (BPA), on behalf of the board of directors and the membership, in response to particular language in the draft new version of Newton's Open Space and Recreation Plan. Bullough's Pond is both a park and an open space. It attracts both passive and active recreational users. It is both an outstanding natural, historical and practical (flood control) resource. The pond anchors the surrounding neighborhood with its outstanding beauty, and is a place enjoyed by walkers, runners, birdwatchers, kayakers, fishermen, model yacht enthusiasts, artists, tai chi and meditation practitioners, and science classes from the Newton schools.

The BPA, a 501c(3) non-profit entity, has been the steward of the pond for the past 37 years. The organization was founded in 1983 by the late Betsy Leitch and other residents in the neighborhood who were concerned about the then-deteriorating condition of the water and banks of the pond. The BPA lobbied and assisted with the City's effort to obtain state and federal funds for the 1993 dredging of the pond, to address eutrophication and downstream flooding risks associated with storm-drain-related silting of the pond. Since 1983, the BPA has enjoyed a steadily growing membership and a healthy fundraising record. Several hundred local households are members, and most renew year after year. We have strong volunteer participation at NewtonServes and other clean-up days.

The BPA has used its funds to pay for landscape maintenance, to fund the BPA scholarship for Newton High school seniors, to maintain a richly detailed and informative website, and to host events like the Bullough's Pond 350<sup>th</sup> Anniversary fairs, model yacht races, painting classes, student art exhibits and guided birdwatching. In addition, the BPA uses its funds and volunteers to support major initiatives like the removal of invasive bittersweet from the banks of the pond, and the construction of the Bullough's Pond Overlook seating area on the site of the former warming hut. The Overlook project was done in partnership with the Parks, Recreation & Culture Department, and Mayor Fuller cut the ribbon at the dedication ceremony in December 2018.

In Section Seven, "Analysis of Needs", on pages 9-10 of the draft new version of Newton's Open Space and Recreation Plan, there is language about which the BPA would like to comment.

*Public-Private Partnerships*

*Newton has many strong public-private partnerships that have contributed to the preservation and stewardship of numerous open space resources... There are also numerous Friends groups for specific parks and green spaces throughout Newton, such as the Friends of Crystal Lake, Friends of Kennard, Friends of Hemlock Gorge, and Friends of*

*Cold Spring Park. Many of these non-profit organizations provide great assistance to the City in terms of fundraising, volunteer labor, environmental monitoring, and communicating with the public. **The City needs to continue to nurture and strengthen these relationships. (Emphasis added.)***

According to the language above, the City greatly values the work of friends groups that help to maintain Newton's parks and open spaces. We've been told a number of times by City staff and officials that the BPA is one of the most trusted and effective of these groups. The BPA has long had an outstanding relationship with all City departments and staff. We've worked with Parks, Recreation & Culture, Public Works, Public Buildings, the Conservation Planner, the Tree Warden, the Fire Department, the Police Department, the Mayor's Office of Cultural Affairs, boards and commissions, and the Newton Public Schools. We adhere faithfully to the Wetlands Protection Act and other relevant statutes and regulations, and are grateful for the guidance of the City's Conservation Planner. We believe our experience and our advice is valuable, and should be taken into account.

We would like to stress that we depend most of all on our longstanding and positive working relationship with the Parks, Recreation & Culture (PRC) Department in our care of the pond. That's why we would like to express our concern about the following language, also from Section Seven, "Analysis of Needs", pages 9-10 of the draft Open Space and Recreation Plan...

*Efficient Management*

*The Conservation Commission and the PRC are the primary stewards of municipal open space in Newton. The Conservation Commission manages roughly 316 acres for conservation and passive recreation. PRC manages another 450 acres for both passive and active recreational purposes; 239 acres (53%) of PRC managed land is wooded, according to the 2016 National Land Cover Database (NLCD) Tree Canopy data, and at least eight PRC properties contain significant contiguous wooded areas.*

1. Avery Woods
2. Bullough's Pond
3. Crystal Lake (portions)
4. Cold Spring Park (portions)
5. Edmands Park
6. Kennard Park (portions)
7. Nahanton Park (portions)
8. Webster Park

*Parks, Recreation & Culture manages athletic fields, playgrounds, Gath Pool and the Crystal Lake Bathhouse, greenways, and medians. Both the 2011 Comprehensive Plan (7-8) and the 2014-2020 Open Space and Recreation Plan call for the consideration of slight reorganization of management responsibilities to allow the Conservation Commission to focus its efforts on natural areas and the PRC to focus its efforts on the City's improved recreation facilities and street trees. **Such a redistribution of management responsibilities would focus City expertise and develop clearer channels of communication for residents and volunteers. Those eight Park properties containing significant contiguous wooded areas may, following ecological site assessment, be well-suited to management by the Conservation Commission. Consistent management and possible legal protections could benefit Newton in the long run. (Emphasis added.)***

*Funding*

*Like many communities, the City of Newton is limited in terms of the funding it can direct toward the maintenance of open space and recreation areas. **Proposals about sharing duties for maintenance between the Conservation and PRC departments may improve efficiencies. (Emphasis added.)***

*Funding for open space efforts has come from a number of sources, including the annual budget, Community Preservation Act (CPA), Land and Water Conservation Funds (LWCF), Parkland Acquisitions and Renovations for Communities (PARC) Grant Program, and Local Acquisitions for Natural Diversity (LAND) Grant Program (Massachusetts SCORP 2017, pp. 1-6); in addition to numerous donations raised by Friends groups and individuals.*

Communication between the BPA and City departments is excellent because our working relationship with the Parks, Recreation & Culture Department is so strong. If we are not sure which City department should be involved with a particular issue, PRC staff guide us immediately. PRC staff respond quickly to any concerns we raise about repairs, vandalism, water quality, wildlife, etc. PRC has the management infrastructure, staff, expertise, equipment and budget to address needs that we bring to their attention. If a fence needs to be fixed, they have the means to fix it. Frankly, if we need help with almost anything, they assist us. They have the trucks, the gear and the crews to do that, plus great management in that department.

In contrast, the Conservation Commission, has no management infrastructure, crews, trucks, equipment nor budget to help groups like ours as we do the hands-on, practical work of caring for the parks and open spaces to which we have dedicated years of volunteer service. The Conservation Commission, an appointed body responsible for overseeing compliance with environmental regulations in land use, does an outstanding job at that, but has no capacity to assist the BPA or other friends organizations with the practical, day-to-day stewardship of the parks and open spaces to which we have dedicated so much of our personal time and funds. The “efficient management” of Bullough’s Pond is that of the PRC, and we strongly advise against the transfer of management responsibility for Bullough’s Pond away from the PRC.

We find the following sentence odd: “*Consistent management and possible legal protections could benefit Newton in the long run.*” Management of Bullough’s Pond by the PRC has been consistent and professional for many years. Moreover, legal protections are afforded by laws, not by which City department or appointed body has management authority over a property. We question the assertion that obtaining public funding for maintenance of Bullough’s Pond would be more efficient if management responsibility were transferred away from the PRC. Under the management of the PRC (then “Parks & Recreation”), Bullough’s Pond received hundreds of thousands of dollars in federal and state funding to pay for the 1993 dredging. Multiple City departments, and elected officials at the local, state and congressional level assisted with that effort. There is no reason to think that under the PRC’s management, future attempts to secure public funding would be anything but efficient. We respectfully request that you edit the draft to eliminate the idea of transferring management authority for Bullough’s Pond away from the PRC. Thank you for considering our view.

Sincerely,



Laura R. Studen,  
President, Bullough’s Pond Association