

Boston Groundwater Trust

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November 26, 2012

Mr. Geoffrey Lewis, Senior Project Manager
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201-1007

Subject: 40 Trinity Place

Dear Mr. Lewis:

Thank you for the opportunity to comment on the Project Notification Form for 40 Trinity Place. The Boston Groundwater Trust was established by the Boston City Council to monitor groundwater levels in sections of the city where the integrity of building foundations is threatened by low groundwater levels and to make recommendations for solving the problem. Therefore, my comments are limited to groundwater related issues.

As noted in the PNF, the project is located in the Groundwater Conservation Overlay District established under Article 32 of the Zoning Code. As also noted in the document, the project is located in an area where groundwater levels have historically been depressed below what is typical and below where wood pilings are generally cut off, exposing the tops of the pilings to oxygen and potential rot, with groundwater elevations measured generally between EL 2.5 and 5.5 when measured against Boston City Base.

Compliance with the GCOD requires both a demonstration that the project cannot cause a reduction in area groundwater levels and the installation of a recharge system. As stated in the PNF, the existing building includes a one level basement that extends to approximately EI 8 BCB, as well as a partial sub-basement reaching approximately EI 0 BCB. During the scoping session, the proponent described plans to retain the existing basement as part of the new structure after demolition of the existing building. Before the GCOD zoning approval can be put in place, the proponent should submit to the Board of Appeals a letter stamped by a professional engineer registered in Massachusetts that shows how it will meet the requirement for no reduction in groundwater levels on site or on adjoining lots. Because, according to the PNF, the new deep piling system will penetrate the existing basement (and perhaps sub-basement) floor, the certification should explain how this will not increase vulnerability to groundwater entering the building and potentially lowering surrounding groundwater levels.

In section 3.5.4.3 of the PNF, the proponent states that the recharge system is anticipated to have the capacity to capture the equivalent of one inch of rainfall over the building's plan area, which is the standard mandated in Article 32. The DPIR should include a plan showing where the recharge system will be located. We will be happy to meet with the proponents and their consultants to help determine the best way to approach what is a somewhat constrained site.

I look forward to working with the proponent and the Authority to assure that this project can have only positive impacts on area groundwater levels.

Very truly yours,

Elliott Laffer
Executive Director

Cc: Kathleen Pedersen, BRA
Maura Zlody, BED