March 17, 2011

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

Subject: Berklee College of Music, 168 Massachusetts Avenue

Dear Mr. Autler:

Thank you for the opportunity to comment on the Project Notification Form for 168 Massachusetts Avenue. 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.

I appreciate the recognition by the proponent that the project is located in the Groundwater Conservation Overlay District and the commitment, as stated in the PNF, to meet the standards required in that area. As stated in the document, the project site is in an area of filled land and the existing buildings on the site are supported by wood pilings. We are aware of numerous other nearby buildings that are wood piling supported as well.

According to Article 32 of the Zoning Code, a project subject to GCOD requirements must meet two conditions for approval. It must show that there will be no reduction in groundwater levels on site or nearby caused by construction or operation of the building, and it must provide a specified amount of recharge capacity from captured precipitation. In the PNF and in comments during the scoping session, the proponent explained the plans for doing so.

The proponent has committed that they will prevent a reduction in groundwater levels by fully waterproofing the underground space, by installing a sheet piling wall during construction to prevent the intrusion of groundwater into the site, and by using a waterproofed slab with no underdrains for relief of upward pressure. It is critical that the selection of backfill and construction methods be such that no path can be created along the exterior of the construction that will allow groundwater in the trapped upper aquifer that is crucial to piling protection to drain to a lower elevation. As required under the zoning, all of the steps to assure that the project cannot cause a reduction in groundwater levels must be detailed in a stamped letter from a professional engineer registered in Massachusetts. This letter should be filed before the zoning process for the project is complete.

During the scoping session, the proponent said that the recharge requirement will be met by the installation of an appropriately sized tank in the building and one or more injection wells to be installed in the adjacent private alley controlled by the
proponent. Plans for the recharge system should be submitted to the Boston Water and Sewer Commission for their confirmation that they meet the GCOD requirements. Again, this should be done in time for BWSC to complete its response before the zoning process is complete.

In order to assure that the project is not having an unanticipated negative impact on nearby groundwater levels, the proponent should monitor the levels in nearby observation wells at least weekly during below grade construction work. These readings should be reported promptly after they are taken to the Authority and the Trust.

The Trust has one groundwater observation well located in the public sidewalk adjacent to the site at the corner of Massachusetts Avenue and St. Germain Street. If it is necessary to damage or destroy the well during the construction process, the proponent should commit to replacing the well at the same location after construction.

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

Very truly yours,

Elliott Laffer
Executive Director

Cc: Kathleen Pedersen, BRA
    Maura Zlody, BED