Dear Mr. Cohen:

Thank you for the opportunity to comment on the project notification form (PNF) for the 321 Harrison Avenue Project. The Boston Groundwater Trust was established by the Boston City Council to monitor groundwater levels in sections of Boston 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.

The project is located in the Groundwater Conservation Overlay District (GCOD) established under Article 32 of the Zoning Code. As stated in the PNF and confirmed at the scoping session the project is proposed to be designed and constructed to comply with the requirements of Article 32.

Also stated in the PNF and confirmed at the scoping session the GCOD requires both the installation of a recharge system and a demonstration that the project cannot cause a reduction in groundwater levels on site or on adjoining lots. The PNF states that new foundations within the garage will be comprised of small diameter drilled in piles with new pile caps placed below the existing basement floor grade, approximately El. 6 Boston City Base (BCB). The PNF also states that new elevator pits extending below the lowest level floor slab will be waterproofed and no foundation drains or other features that could withdraw groundwater long term will be used.

Before the GCOD zoning approval can be put in place, the proponent must provide the BRA and the Trust a letter stamped by a professional engineer registered in Massachusetts that details how it will accomplish what is stated in the PNF and meets the GCOD requirement for no reduction in groundwater levels on site or on adjoining lots.
As discussed at the scoping session two (2) Trust groundwater observation wells are located within the footprint of the proposed project. Trust wells 22K-1629 (Corner of Herald Street and Harrison Avenue) and 22K-1689 (Corner of Mullins Way and Harrison Avenue) must be preserved, maintained, and be made accessible for Trust staff to make readings throughout development of the project. It is the sole responsibility of the proponent to ensure the preservation of these two observations wells.

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

Very truly yours,

Christian Simonelli
Executive Director

CC: Kathleen Pederson, BRA
Maura Zlody, BED