Subject: Back Bay/South End Gateway Project Notification Form

Dear Mr. Tracy:

Thank you for the opportunity to comment on the project notification form (PNF) for the Back Bay/South End Gateway 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, confirmed in a preliminary meeting, and at the scoping session the project is proposed to be designed and constructed to comply with the requirements of Article 32.

As confirmed in a preliminary meeting and 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. In the case of the Back Bay/South End Gateway Project four separate parcels designated Garage West, Garage East, Station East, and Station West will all need to be addressed individually. As stated in the PNF, the proposed construction of the four separate parcels is anticipated to require various foundation types with construction of the four parcels occurring in different phases. Before the GCOD zoning approval can be put in place, the proponent must provide the Authority and the Trust a letter stamped by a professional engineer registered in Massachusetts that details how each of the four parcels 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.

The PNF states that some local dewatering may be required during the construction processes. The PNF also states that the feasibility of recharging temporary dewatering effluent into the ground will be investigated during the design of the Project.

The PNF states that performance criteria will be established for maintenance of groundwater levels during construction in the vicinity of the Project. In addition the PNF also states that the contractor will be required to implement necessary steps during the work to not lower groundwater levels outside the limits of the Site and that geotechnical instrumentation will be installed and monitored before and during the foundation installation portion of the work to observe the performance of the adjacent buildings and structures.
The groundwater level data should be furnished to the Trust and the Authority on a weekly basis. In the event that groundwater levels drop below the observed pre-construction baseline levels during construction, provisions must be in place to halt construction and dewatering until the cause is found and remedied. I look forward to working with the proponents Engineer on reviewing the monitoring wells in the area to be read and reported. Reporting of the groundwater level data and provisions to halt construction and dewatering if groundwater levels outside the project site drop below baseline levels should mirror the plan developed by the projects Engineer for the 888 Boylston Street project.

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