

# Boston Groundwater Trust

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Christian Simonelli

April 10<sup>th</sup>, 2017

Michael Rooney, Project Manager  
Boston Planning and Development Agency  
One City Hall Square  
Boston, MA 02201-1007

Subject: Back Bay/South End Gateway Draft Project Impact Report (DPIR) Comments

Dear Mr. Rooney:

Thank you for the opportunity to comment on the draft project impact report (DPIR) 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 DPIR, confirmed in a preliminary meeting, and at the scoping session for the Project Notification Form on May 11<sup>th</sup>, 2016, the project is proposed to be designed and constructed to comply with the requirements of Article 32.

The DPIR states that approximately three quarters of the Project Site is located on the Air Rights Development Parcel located over transportation facilities and infrastructure that are at an elevation below the desired groundwater recharge elevation. The DPIR also states that it may not be possible to infiltrate the first inch of runoff over the entire post-development impervious area. The DPIR states that Garage West Parcel, Garage East Parcel, and Station East Parcel will have clean runoff directed to a recharge system designed to infiltrate stormwater runoff in order to replenish groundwater. The DPIR states that the clean runoff from Station West Parcel will likely be directed to the existing MBTA storm drain systems below the existing station that ultimately discharges to Deer Island Waste Water Treatment Plant. To fully comply with the Article 32 zoning component of capturing the first inch of runoff the proponent should work with BWSC and the Trust to explore all possible types of recharge systems and methods of stormwater management.

As confirmed in a preliminary meeting and at the above referenced 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 DPIR, the proposed construction of the four separate parcels will require various foundation types with construction of the four parcels occurring in different phases. As stated in the DPIR, the proponent will provide the BPDA, BWSC and the Boston Groundwater Trust a letter stamped by a professional engineer registered in Massachusetts that details how the GCOD criteria will be achieved for each individual Project Component prior to the issuance of a building permit in compliance with the requirements of PDA No. 2. This letter must also detail how each of the four parcels will meet the GCOD requirement for no reduction in groundwater levels on site or on adjoining lots.

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

The DPIR states that performance criteria will be established for maintenance of groundwater levels during construction in the vicinity of the Project. In addition the DPIR 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 Project 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 Agency 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 Agency to assure that this project can have only positive impacts on area groundwater levels.

Very truly yours,

A handwritten signature in cursive script that reads "Christian S. Simonelli".

Christian Simonelli  
Executive Director

CC: Kathleen Pederson BRA,  
Maura Zlody, BED