

Boston Groundwater Trust

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August 8th, 2017

Matthew A. Beaton
Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky EEA No. 15502
100 Cambridge Street, Suite 900
Boston MA 02114
Subject: Back Bay/South End Gateway Final Environmental Impact Report (FEIR)
Comments

Dear Secretary Beaton:

Thank you for the opportunity to comment on the final environmental impact report (FEIR) 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 FEIR, the project is proposed to be designed and constructed to comply with the requirements of Article 32 for the majority of the project site.

The FEIR states that the Garage West Parcel and the Garage East Parcel will each capture the volume equivalent of 1-inch of rainfall across the new impervious roof areas through the installation of injection wells. The FEIR states that the exact location and configuration of these systems will be determined as the design of each parcel advances. I look forward to working with the proponent in reviewing these configurations prior to final design and implementation.

The FEIR states that the Station East and the Station West parcels are Air Rights Development Parcels over existing Station facilities (track and/or concourse levels) and both parcels are further constrained by the absence of terra firma on-site and their frontage on the bridge sections of Dartmouth and Clarendon Streets.

As discussed with the proponent on June 6th, 2017 and stated in the FEIR there is the potential option (Option 2) to collect the 1-inch rainfall volume from the Station East roof area. This would be accomplished by directing it through the existing Garage to remain to the groundwater recharge systems being considered as part of the Garage West and Garage East Parcels. The FEIR states that there are two additional options which propose on-site reuse and retention (Option 1) and off-site mitigation options (Option 3). In order to comply with the provisions of Article 32 the as stated above Option 2 would fulfill the requirement and therefore meet the zoning.

As discussed with the proponent on June 6th, 2017 and stated in the FEIR space limitations for the Station concourse make on-site retention or water reuse for the Station West Parcel unfeasible. Despite this the proponent has expressed a commitment to finding off-site mitigation options to comply with Article 32. 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 discussed with the proponent on June 6th, 2017 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 FEIR, 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 FEIR, 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 FEIR 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 FEIR states that performance criteria will be established for maintenance of groundwater levels during construction in the vicinity of the Project. In addition the FEIR 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 BPDA 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 to assure that this project can have only positive impacts on area groundwater levels.

Very truly yours,



Christian Simonelli
Executive Director