

Boston Groundwater Trust

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May 24, 2011

Ms. Kristin Kara, Senior Project Manager
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201-1007

Subject: Christian Science Plaza Revitalization Project

Dear Ms. Kara:

Thank you for the opportunity to comment on the Planned Development Area Master Plan for the Christian Science Plaza. 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 proponent's acknowledgement that the project is located in the Groundwater Conservation Overlay District and commitment to meet the requirements imposed under Article 32 of the Zoning Code for building in that area. I appreciate as well the proponent's commitment to "increased groundwater infiltration to support adequate groundwater levels" as one of the public benefits to be gained from the project. The proponent has reached out to the Trust to discuss the best ways to accomplish this and has begun sharing with us additional data from groundwater wells on their property that they have been monitoring for some time. They have also allowed the Trust to add several wells on their property to our network so that we can monitor and post groundwater levels there on a regular basis.

Because this will be a Planned Development Area, Article 32 compliance will not be assured through the Board of Appeals process followed in projects developed under the non-PDA zoning process. The proponent has proposed to file their recharge plan with the Boston Water and Sewer Commission as they would in the ZBA process and provide the BRA and the Trust with the approval letter. With appropriate confirmation in the Cooperation Agreement and/or other documents, this will be adequate to assure compliance with the recharge requirement. However, Article 32 imposes a second requirement. The proponent must show, in a stamped certification by a professional engineer registered in Massachusetts, that the project will cause no reduction in groundwater levels on site or on adjoining lots either during construction or during operation of the building. This is particularly important in this project since there is the potential for a multi-level underground garage on the Belvidere/Dalton site, an area near multiple wood piling supported structures.

Because the buildings planned for this development have yet to be designed and will, as noted in the document, undergo separate Article 80 reviews, I will reserve comments on building details until they are available. I look forward to continuing to work with the Authority and the proponent to assure that this major project can have only positive impacts on area groundwater levels.

Very truly yours,

Elliott Laffer
Executive Director

Cc: Kathleen Pedersen, BRA
Maura Zlody, BED