

Boston Groundwater Trust

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September 8, 2011

Mr. John FitzGerald, Project Manager
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201-1007

Subject: Copley Place Retail Expansion and Residential Addition

Dear Mr. FitzGerald:

Thank you for the opportunity to comment on the Draft Project Impact Report for the Copley Place addition. I would also like to thank the proponent for taking the time to meet with me to go over groundwater related issues in more detail. 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 is required to meet the standards required in the GCOD. In response to a comment included in my July 30, 2008 response to the Project Notification Form, the proponent asserts that the residential tower will be, by code, defined as a separate entity from the existing Copley Place. This would, under the proponent's interpretation, indicate that the required volume of recharge is based on the plan area of the tower as a new structure, as well as the plan area of the retail addition as an extension of the existing mall. The Authority should confirm if this is the correct interpretation, or if the project is, in fact, a substantial renovation of the existing property that would require the recharge volume to be based on the total plan area of Copley Place.

The current plan for a recharge system would place the storage volume under the newly extended public sidewalk at the corner of Dartmouth and Stuart Streets. This location is the part of the construction that is closest to an area across Dartmouth Street where there are chronically low groundwater levels near buildings supported on wood pilings. It is important that the proponent confirm with the Public Improvement Commission that the use of this location is likely to be approved.

In addition to the recharge requirement, the GCOD mandates that the proponent show, in a letter stamped by a professional engineer registered in Massachusetts, that the project will be designed and built in a way that will not cause a reduction in groundwater levels on the site or adjacent properties. The proponent notes that the project is to be built on air rights, with no temporary or permanent dewatering required. I am pleased at the proponent's commitment to provide the required certification.

In my earlier comment letter, I spoke of the low groundwater area noted above and asked if the project could investigate potential causes. I am pleased that the proponent has committed, both in the DPIR and in our subsequent meeting, to conduct this investigation.

As the proponent stated during our meeting, they have not yet completed detailed plans for their recharge system. I look forward to receiving those plans when they are completed. In addition, I look forward to continuing to work with the proponent and the Authority to assure that the project can have only positive impacts on nearby groundwater levels.

Very truly yours,

Elliott Laffer
Executive Director

Cc: Kathleen Pedersen, BRA
Maura Zlody, BED