October 4th, 2018

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

Subject: Motor Mart Garage Project Notification Form (PNF) Comments

Dear Mr. Rooney:

Thank you for the opportunity to comment on the Motor Mart Garage Project Notification Form (PNF) located in the Midtown Cultural District. 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 document and confirmed at the scoping session, the project will be designed and constructed to comply with the requirements of Article 32.

As stated in the document and confirmed at the scoping session, part of the proposed redevelopment of the building includes adding basement level retail space. The document also states that temporary dewatering in isolated excavations for foundation and substructure is anticipated. Given the relatively limited nature of dewatering, the Project is expected to have negligible long-term impacts on groundwater levels. New foundations required for the Project are anticipated to be drilled-in, high capacity, deep foundations bearing in the dense glacial soils or bedrock underlying the site. No pile driving is planned. The drilled-in foundations result in negligible impacts to adjacent structures. Specific design and construction performance criteria will be established to be protective of adjacent structures. Also, groundwater level monitoring will be undertaken during construction to document impact to area groundwater levels. The well will be installed prior to construction and monitored throughout foundation construction.

The Project team shall coordinate with the Trust and confirm where the observation well will be installed. The groundwater level data should be furnished to the Trust and the Agency on a weekly basis. In addition, the proponent confirmed at the scoping session that the only below-grade work will be for the installation of these foundation elements and no new occupiable space will be created.
As stated in the document the project site is vulnerable to storm surge, and stormwater flooding. As part of its resiliency strategy the proponent will take measures to minimize the impact of potential flooding at the site, including the following:

- Critical infrastructure will be located above the 500-year flood plain, including boilers, cooling towers, generators and building switchgear, as will major air intakes and discharge points.
- Knee wall barriers are proposed for the surrounding ground floor storefronts. Temporary flood barriers will be deployed in areas without knee walls.
- A modular approach will be taken for the mechanical infrastructure; this will allow the equipment to be more standard commercial “off the shelf” type. This will help reduce the lead times for replacement equipment, allowing more rapid recovery.
- The Project will incorporate water tight utility conduits, waste water back flow prevention, and storm water back flow prevention.

In addition, as part of its initial evaluation the proponent should identify and remedy existing critical infrastructure which may have a negative impact on groundwater levels.

The document states that Sidewalks surrounding the site will be improved in accordance with Boston Complete Streets guidelines, including new street lighting and new street trees where feasible. At the scoping session the proponent committed to exploring pervious paving materials for Sidewalks surrounding the site.

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,

Christian Simonelli
Executive Director

CC: Kathleen Pederson, BPDA
Maura Zlody, EEOS