

Boston Groundwater Trust

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January 31, 2011

Mr. Tai Lim, Senior Project Manager
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201-1007

Subject: Parcel 24 Project

Dear Mr. Lim:

Thank you for the opportunity to comment on the Notice of Project Change on the Parcel 24 Project. 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 restricted to groundwater related issues.

The project, as it relates to groundwater, has changed in some significant ways since we commented on the Project Notification Form in September 2008. Of greatest note, instead of a one level deep garage extending under the entire project, there is now a three level deep garage under a portion of the North Building only. As discussed in the scoping session and in a later meeting with the project team, this raises two issues of concern: the deeper garage presents more underground surface area that, if not watertight, could lower surrounding groundwater levels; also since the excavation will penetrate the relatively impervious organic layer it could create a path that would allow groundwater in the critical trapped upper aquifer to drain away from the level that protects wood pilings. It is important to note that the project is located along Hudson Street, an area where several buildings were demolished in the 1980's because of foundation failures caused by wood piling deterioration. I am pleased that the proponent has committed to address these issues by waterproofing the walls and bottom slab, having no underdrains, and using suitable material as backfill to prevent the potential leak path. These plans will need to be addressed in the required letter stamped by a registered professional engineer showing how the project cannot cause a reduction in area groundwater levels.

In another change, removal of the garage structure from beneath the park area between the two structures affords a better opportunity to meet the recharge requirements in the Groundwater Conservation Overlay District established under Article 32 of the Zoning Code. I appreciate the proponent's commitment to meet or exceed this requirement and to provide the recharge as close as possible to Hudson Street to provide maximum benefit to nearby wood piling supported buildings.

I look forward to continuing to work with the proponent and the Authority to assure that this project can have only positive impacts on groundwater levels in the Chinatown area.

Very truly yours,

Elliott Laffer
Executive Director

Cc: Kathleen Pedersen, BRA
Maura Zlody, BED