

# Boston Groundwater Trust

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Elliott Laffer

August 8, 2013

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

Subject: 40 Trinity Place

Dear Mr. FitzGerald:

Thank you for the opportunity to comment on the Draft Project Impact Report for 40 Trinity Place. The Boston Groundwater Trust was established 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.

As noted at the scoping session the Trust's comment letter written in response to the Project Notification Form for this project was not included in the DPIR document for this project. After the proponent and the Authority were made aware of this omission and the Trust's comments the proponent prepared a response letter to the Trust.

As stated in the DPIR, the project is located in the Groundwater Conservation Overlay District established under Article 32 of the Zoning Code. The proponent committed in the DPIR to meet the recharge requirements in the GCOD. In the follow-up letter sent to the Trust the proponent states that the infiltration system will be located near the loading area in the back of the site. The letter also states that the final design and stormwater calculations will be submitted to the Boston Water & Sewer Commission for their review and approval with a copy being provided to the Trust.

As stated in the PNF and in the response to comments section of the DPIR the existing building includes a basement level and a partial sub-basement level. At the scoping session and in the subsequent letter sent to the Trust the proponent stated that the existing sub-basement level will be filled as part of the project. The proponent also stated that the remainder of the building is above elevation 8 BCB and the site groundwater levels. The proponent stated that construction below El. 8 will include the use of discrete pile foundations. The proponent also stated that any penetrations through the basement slab will be fully waterproofed as needed to mitigate potential water seepage into the basement or impacts to area groundwater levels. Article 32 requires that the project provide a certification, stamped by a professional engineer registered in Massachusetts, showing how it will not cause a reduction in groundwater levels on site or on adjoining lots. Since the pile foundations will penetrate through the basement slab this certification needs to describe how

the piles will not allow groundwater to enter the building or lower groundwater levels. In addition, the certification should address how any existing utility connections, whether currently functioning or abandoned, will be sealed to assure that there will be no leakage of groundwater into the filled-in subbasement space.

As noted at the scoping session the Trust has two existing groundwater observation wells located in the southern sidewalk of Stuart Street that runs from Trinity Place to Clarendon Street. The DPIR states that this southern portion of Stuart Street sidewalk will be rebuilt and widened to enhance the pedestrian realm. The two wells are located next to the curb line and special care must be taken when the sidewalk is rebuilt and widened to avoid disturbing these wells. The proponent acknowledged that the wells will be properly identified beforehand and cared for during construction of the new sidewalk.

I look forward to working with the proponent and the Authority to assure that the project can have only positive impacts on area groundwater levels.

Very truly yours,

Elliott Laffer  
Executive Director

Cc: Kathleen Pedersen, BRA  
Maura Zlody, BED