

# Boston Groundwater Trust

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## Executive Director

Elliott Laffer

December 2, 2013

Ms. Casey Hines, Project Manager  
Boston Redevelopment Authority  
One City Hall Square  
Boston, MA 02201-1007

Subject: 600 Harrison Avenue

Dear Ms. Hines:

Thank you for the opportunity to comment on the Project Notification Form for 600 Harrison Avenue. 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, especially those supported on wood pilings, is threatened by low groundwater levels and to make recommendations for solving the problem. Therefore, my comments are limited to groundwater related issues.

As noted multiple times in the PNF, the project is located in the Groundwater Conservation Overlay District established in Article 32 of the Boston Zoning Code. The proponent has committed to meet the recharge requirements needed for the Board of Appeals to approve a permit under the GCOD. They have also committed to constructing a recharge system for the adjacent Saint Helena's House that would allow that property to meet GCOD recharge requirements years before any project is planned that would trigger Article 32 for that site.

Approval under GCOD also requires that the project provide a certification stamped by a professional engineer registered in Massachusetts that demonstrates why the project will not cause a reduction in groundwater levels on site or on adjacent lots. This is particularly important because the project will include an underground garage of at least two, and possibly three, levels. In addition to preventing infiltration into the structure, it is also critical that the project be designed and built so that no path is created that would allow water to drain from the upper aquifer that is crucial to protection of wood pilings to a lower level. I appreciate the proponent's commitment at the scoping session to provide the needed certification.

In the PNF, the proponent commits to installing additional groundwater observation wells in the vicinity of the project to monitor groundwater levels prior to, during, and following construction. Results of those observations should be shared promptly with the Authority and the Trust. In addition, if the wells are to be located on public property, they should be built to Trust specifications and turned over to the Trust, in accordance with Public Improvement Commission policy, when no longer needed by the project.

I look forward to working with the proponents and the Authority to assure that the project can have only positive impacts on groundwater levels in the South End.

Very truly yours,

Elliott Laffer  
Executive Director

Cc: Kathleen Pedersen, BRA  
Maura Zlody, BED