

Boston Groundwater Trust

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September 29th, 2017

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

Subject: Back Bay/South End Gateway Supplemental Filing and PDA Submission
Notice Comments

Dear Mr. Rooney:

Thank you for the opportunity to comment on the Supplemental Filing and PDA Submission Notice for the Back Bay/South End Gateway Project. 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 PDA submission notice, in various previous documents, multiple meetings, and at the scoping session for the Project Notification Form on May 11th, 2016, the project is proposed to be designed and constructed to comply with the requirements of Article 32.

The PDA states that the Project will include facilities to capture stormwater runoff and direct it to retention and reuse or infiltration systems consistent with the requirements of Article 32, with the goal of replenishing the groundwater table. The PDA also states that approximately three-quarters of the Project Site is located on air rights located over transportation facilities and infrastructure that are at an elevation below the desired groundwater recharge elevation. Therefore, it is not possible to infiltrate the first inch of runoff over the entire post-development impervious area for the entire Project. To fully comply with the Article 32 zoning component of capturing the first inch of runoff the proponent should work with BWSC and the Trust to explore all possible types of recharge systems and methods of stormwater management.

The PDA states that the Proponent will provide the BRA, BWSC, and Boston Groundwater Trust a letter stamped by a professional engineer registered in Massachusetts that details how the GCOD criteria will be achieved to the maximum extent practicable for each of the Project Components prior to the issuance of a building permit in compliance with the requirements of this Amended and Restated PDA Plan. In the case of the Back Bay/South End Gateway Project four separate parcels designated Garage West, Garage East, Station East, and Station West will all be constructed at different times and therefore need to be addressed individually. This letter must also detail how each of the four parcels will meet the GCOD requirement for no reduction in groundwater levels on site or on adjoining lots. The PDA states that the Project shall be deemed to be in compliance with Article 32 of the Code and the Project shall not need a conditional use permit from the Board of Appeal under Article 32.

The PDA also states that the original PDA Plan predates adoption of the GCOD requirements. Accordingly, such requirements do not apply to Parcel 3 or the Existing Garage on the Project Site. The original PDA plan predating the adoption of GCOD does not absolve Parcel 3 or the Existing Garage on the project site from meeting the GCOD requirements of both the one-inch capture and no harm certification. Both conditions are still required to be met.

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,

A handwritten signature in cursive script that reads "Christian S. Simonelli".

Christian Simonelli
Executive Director

CC: Kathleen Pederson BRA,
Maura Zlody, BED