## Boston Groundwater Trust

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December 11th, 2019

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## **Executive Director**

Christian Simonelli

Edward Carmody, Institutional Planner & Project Manager Boston Planning & Development Agency One City Hall Square Boston, MA 02201-1007

Subject: Boston Medical Center (BMC) Institutional Master Plan Notification Form (IMPNF) Comments

Dear Mr. Carmody:

Thank you for the opportunity to comment on the Boston Medical Center (BMC) Institutional Master Plan Notification Form (IMPNF) which is located in the South End. The Boston Groundwater Trust (BGwT) 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.

As stated in the document and confirmed at the scoping session the proposed IMP Projects are located within the Groundwater Conservation Overlay District (GCOD). BMC will incorporate systems into the proposed IMP projects designs that meet the groundwater conservation standards set forth in Article 32 of the Boston Zoning Code. BMC will obtain a written determination from the Boston Water and Sewer Commission as to whether said standards are met and will provide a copy of this letter to the BPDA and the Boston Groundwater Trust (BGwT) prior to the issuance of a Certificate of Consistency. Accordingly, BMC will comply with the requirements of Article 32 and so will not be required to obtain a conditional use permit from the Board of Appeals for its proposed IMP Projects.

The designs for each project will comply with Article 32 and City standards by establishing design and construction methodology which protects groundwater. The Projects will demonstrate that the permanent construction results in no negative impacts to groundwater levels through engineering evaluations.



The engineering evaluations must be submitted, in a letter, to the BGwT and BPDA demonstrating that the standards have been met and stamped by a professional engineer registered in Massachusetts. The document also states that methods to assure these standards include use of fully waterproofed basement (walls and lowest level floor slabs) for the portion of the structure that extends below groundwater levels which will be designed to resist hydrostatic uplift pressures. Design criteria for the Projects will include the provision that no long-term groundwater pumping will be allowed. BMC will conduct the appropriate studies as part of the BPDA's Article 80 Large Project Review process.

As stated at the scoping session foundation data for older, wood pile supported structures in the City is an important piece of information but is limited since most of the original buildings permits do not exist. I was pleased that the proponent committed to providing the BGwT with copies of any available foundation data they have in their records.

I look forward to working 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

