## Boston Groundwater Trust

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## **Executive Director**

Elliott Laffer

October 28, 2013

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

Subject: Hotel Commonwealth Expansion

Dear Mr. FitzGerald:

Thank you for the opportunity to comment on the Project Notification Form for the Hotel Commonwealth Expansion 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, especially those supported by 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.

I appreciate the efforts of the proponent and its consultants to reach out to the Trust before the October 24 scoping session. In addition to the information included in the PNF, I have received a description of, and plans for, the required recharge system from Judith Nitsch Associates, as well as information about the elevation of the lowest level slab and foundation system from Haley and Aldrich. My comments reflect this information, as well as that included in the PNF and added at the scoping session.

As acknowledged in the PNF, the project is located in the Groundwater Conservancy Overlay District established under Article 32 of the Zoning Code. The proponent has pledged to meet the standards required in the GCOD. In addition to the recharge requirements, Article 32 requires that the proponent submit a certification, stamped by a professional engineer registered in Massachusetts, which describes why the project will not cause a reduction in groundwater levels on site or on adjacent lots. Both this certification and the approval letter from the Boston Water and Sewer Commission indicating compliance with the recharge requirement should be received before the project goes before the Board of Appeals for zoning approvals.

The PNF and my conversation with Haley and Aldrich both indicate that the required excavation for the one level of below grade parking is anticipated to be above the groundwater level. The project should be designed so that there is no underdrain system. Any section that might be exposed to groundwater should be waterproofed to prevent leakage. There should be no system to pump away groundwater infiltration.

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

Very truly yours,

Elliott Laffer **Executive Director** 

Cc: Kathleen Pedersen, BRA Maura Zlody, BED