Boston Groundwater Trust

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Subject: Massachusetts Eye and Ear Infirmary

Dear Ms. Gandhi:

Thank you for the opportunity to comment on the Institutional Master Plan Notification Form/Project Notification Form for the Massachusetts Eye and Ear Infirmary. 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.

February 1, 2011

The document contemplates three new projects. They will each have different potential groundwater impacts.

As noted in the document, the portion of the project located west of Cambridge Street is located within the Groundwater Conservation Overlay District established under Article 32 of the Zoning Code. I am pleased with the proponent's commitment at the scoping to meet the recharge requirements mandated in the GCOD. The proponent indicated that the building proposed to be constructed on the John Jeffries House parking lot will likely have one level below grade for mechanical equipment. As also required under the GCOD, the proponent must submit a letter stamped by a registered professional engineer demonstrating how the project will not cause a reduction in area groundwater levels during construction or operation. This project is located adjacent to areas along Charles River Square and West Hill Place where buildings have been severely impacted by low groundwater problems and continue to require extensive structural repairs, so compliance with these requirements is particularly critical.

While the building to be built on Cambridge Street lies outside the boundaries of the GCOD, it is very close to this groundwater sensitive area. The Flat of Beacon Hill is an area where many buildings have required expensive repairs because of damage caused by low groundwater levels. As described by the proponent, the building will include three below grade levels to accommodate mechanical equipment and other back of house functions. The building should be designed so that it too will cause no reduction in area groundwater levels; the means of assuring this should be addressed in the same letter addressing the issue for the building in the GCOD.

The construction at the Infirmary's main building is located outside the GCOD. The project is not contemplated for construction until 2017, and many details

remain to be worked out. The implications for groundwater will become clearer and will be addressed during the Article 80 approval process.

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

Very truly yours,

Elliott Laffer Executive Director

Cc: Kathleen Pedersen, BRA

Maura Zlody, BED