## Boston Groundwater Trust

229 Berkeley St, Fourth Floor, Boston, MA 02116 617.859.8439 www.bostongroundwater.org

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October 19th, 2017

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**Executive Director** 

Christian Simonelli

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

Subject: 1000 Boylston Street Draft Environmental Impact Report (DEIR)/Draft Project Impact Report (DPIR) Comments

Dear Mr. Rooney:

Thank you for the opportunity to comment on the 1000 Boylston Street Draft Environmental Impact Report (DEIR)/Draft Project Impact Report (DPIR) located in the Back Bay. 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 document and confirmed at the scoping session the project is proposed to be designed and constructed to comply with the requirements of Article 32. Also stated in the document and confirmed at the scoping session, the current design provides the required volume and utilizes injection wells within the sidewalk and infiltration chambers under the loading dock to achieve infiltration despite Site constraints. In addition, due to the limited amount of terra firma the proponent may request a license from the Public Improvement Commission for maintenance of a portion of a recharge system beneath the city sidewalk.

Also noted in the document based on the Trusts' PNF comment letter dated February 23<sup>rd</sup>, 2017 and confirmed at the scoping session, compliance with the GCOD requires both the installation of a recharge system and a demonstration that the project cannot cause a reduction in groundwater levels on site or on adjoining lots. Before the GCOD zoning approval can be put in place, the proponent must provide the BPDA and the Trust a letter stamped by a professional engineer registered in Massachusetts that details how it will accomplish what is

stated in the document and meets the GCOD requirement for no reduction in groundwater levels on site or on adjoining lots.

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,

Christian Simonelli Executive Director

CC: Kathleen Pederson, BPDA

Maura Zlody, EEOS