## Boston Groundwater Trust

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Elliott Laffer

Mr. Geoffrey Lewis, Project Manager Boston Redevelopment Authority One City Hall Square Boston, MA 02201-1007

Subject: 100 Arlington Street

Dear Mr. Lewis:

Thank you for the opportunity to comment on the Expanded Project Notification Form for 100 Arlington Street. 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.

I am pleased that the proponent has recognized that the project is located in the Groundwater Conservation Overlay District and has committed to meeting the standards required under Article 32.I am pleased as well with his commitment to work with BWSC and the Trust to determine the best strategy for the required recharge. I am disappointed, however, that there is no more detail on how the project intends to meet the standard. In particular, there is no indication whether the proponent believes that there is sufficient space on his property for the system or whether he will have to request the use of some public property for a portion of it.

In addition to the recharge requirement, compliance with Article 32 mandates that the project show that it will cause no harm to groundwater levels on site or on nearby properties. While the proponent is not planning new construction, the existing building has basement levels extending 22 feet below the street to a level that is certainly below existing or likely groundwater levels and well below the benchmark Elevation 7 measured against Boston City Base that is specified in the zoning. This is particularly important at this location because some of our nearby observation wells have shown a history of low groundwater levels and there are many nearby wood piling supported structures, particularly in Bay Village. There is no mention in the document of whether the existing

basement is water tight and what steps will be taken to assure that it will be in the future.

I look forward to working with the proponent, as promised in the PNF, and with the Authority to assure that this project can have only positive impacts on area groundwater levels.

Very truly yours,

Elliott Laffer Executive Director

Cc: Kathleen Pedersen, BRA Maura Zlody, BED